



CHATHAM & CLARENDON GRAMMAR SCHOOL

Social Media Vetting of Newly Recruited Staff Policy

Agreed by Governors: November 2023

1. Introduction

Keeping Children Safe in Education (KCSiE) 2022 states within Part 3 paragraph 221:

“As part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.”

This Policy aims to provide suggestions for school leaders, governors and school staff to reflect upon the School's recruitment policies and practices. Staff should work closely with their school's HR advisors to ensure that relevant policies detail how to interpret and put into practice the requirements of social media vetting as prescribed under the KCSiE document. This could include at the point of advertising the post how an on-line check of shortlisted candidates will be undertaken.

Key aspects to consider by staff when recruiting new employees:

- i) Vetting checks will seek information and evidence to enable staff to consider the suitability of a new employee, alongside other existing recruitment requirements. (The term 'online search' is used which, while not specifically mentioning social media, as an online application, along with any wider content should be considered. This could therefore include examples such as Facebook, X (formerly Twitter) and LinkedIn);
- ii) It is important to remember that staff should still undertake wider pre-employment checks such as DBS checks, references and of course questions at an interview. (These aspects are clarified in Part 3 of KCSiE).
- iii) In considering issues and incidents, recruiting staff should be mindful of how such information available would question the individual's suitability to work with children, or their ability to 'harm' the reputation of the school.
- iv) Finally, any search should reflect information that is 'publicly available'. Staff should not be seeking access to individual's social media account passwords, but clearly if accounts are 'un-locked', then any content can be considered.

2. What constitutes incidents or issues and how are these explored?

In considering what might constitute publicly available content, Chatham & Clarendon Grammar School will ensure the completion of an on-line check, for newly employed staff, before they are invited to take up their position and at the same time as references are called.

To ensure all checks are carried out in a consistent and timely manner, the Head's PA should provide a declaration form for this vetting check to be carried out and request the new employee to sign the consent form. The vetting checks are sent to a third party for review. As this check is outsourced, the agency should complete and return a report on the individual.

Examples to consider which are likely to require additional discussion, (not an exhaustive list):

- Any content that is extremist in nature or demonstrates support for such views or beliefs
- Shared views of a discriminatory nature
- Information available online that contradicts information within the candidate's employment history as shared on their application form
- Information alluding to cautions or convictions such as those published in the press
- Images or information that brings their professional integrity into question.

As a result of information being found of the nature above, the Headteacher will need to consider, with the support of their HR advisor which of the following two options are appropriate:

- a) That the content is shared with the new employee at a formal meeting whereby the individual concerned is asked to provide greater clarity and context for the Headteacher to consider in their deliberations alongside the rest of the recruitment process.
- b) That due to the nature of the information found, the newly appointed employee is no longer deemed suitable for the role within Chatham & Clarendon Grammar School and the job offer is revoked.

3. What period of time should such due-diligence cover?

There is no legal statement defining this period, however a period of five years would mirror current requirement for references to be within. Similarly, there may be occasions where from looking at any publicly available information, there is a need to take into consideration information before this time – in essence you cannot 'un-see' something. Where this is the case, the Headteacher should consider making a written note of why this information is being applied and obtain further guidance from the school's HR advisor.

4. Further areas to consider:

- Consider how newly employed staff are informed of such checks at the point of advertising the post similar to the clarity given on the need for a DBS/Barred list check. Wording to the effect of: 'an online check of publicly available information will be completed to assess candidates' suitability to work with children'
- Ensure that the school's code of conduct reminds all current employees of their role in acceptable use of technology, including their sharing of concerns they might have (whistleblowing) about their colleagues including any agency or contractors who have a role at the school

- Seek support from relevant professionals including safeguarding or HR advisors and commissioned legal advisors
- Ensure that this policy is reviewed on an annual basis.

5. Evidencing checks have been completed

Although there is no formal requirement to confirm that any online checks have been undertaken, Chatham & Clarendon Grammar School have a duty of care towards its students and staff and therefore have approved these checks to be carried out. From May 2023, the schools Single Central Record template will have an additional column added to reflect this additional check. On the school's recruitment check-list of new employees, an additional check has been added to demonstrate the social media vetting has taken place. There is no requirement for this check to be backdated for employees whose start date is pre-May 2023.

There is no requirement for any documents such as screen shots or printed pages to be retained on an employee's personnel file. Any notes taken by the interview panel that capture how the new employee explained any available online content that was deemed appropriate should be kept on their personal file.

There is no current requirement for this check to be completed for volunteers (including governors and members) or those in an agency or contractor role.

6. Reviewing this policy

Governors should review this policy on an annual basis.