

## How to Complete a Candidate Online Search

*Supporting guidance to be read in conjunction with the "Record of Online Search" form*

Online searches should only be completed once you have your shortlisted candidates for interview and assessment and should focus on gaining an insight into the applicant's suitability to work with children **only**.

The collection and use of information as part of a recruitment exercise is governed by the Data Protection Act and GDPR. Conducting online searches and gathering information may be gathering information covertly if no data protocols and safeguards are put in place. Schools should take particular care in what and how they process any information they receive from searches, as they become the data controller and their privacy policy applies. If the data is used and relied upon for selection, a school will need a legitimate interest for doing so. This means the need to process the data for child protection purposes takes precedence over the individual's rights.

### *Who carries this out?*

The person carrying out the online searches should not be otherwise involved in the recruitment process. We would encourage an organisation to ensure the independent person undertaking searches receives suitable training and guidance and does not run a search from personal accounts. As a minimum we would recommend they are safer recruitment trained.

### *What information is collected?*

Consideration should also be given to what information is searched for and recorded and ensure a fair and consistent process is undertaken for all candidates. It is recommended that the same themes are searched to cover aspects such as criminal records, safeguarding, employment history, news articles but that the online search is specific to the person's applications and background. The search may also develop depending on what information is found. This is similar to interview questions, all candidates are asked the same core questions (in this instance online search) where the follow-up questions are specific to the candidates responses (in this instance information found).

### *Social media*

Social media checks are not required under the remit of KCSiE. Where a school considers it necessary to undertake social media checks as part of a wider recruitment process, they should first consider whether there is a public interest element to the role to justify legitimate interest (i.e. the individuals being in a position of heightened responsibility and names are in the public domain e.g. CEO or Headteacher). This rationale should be recorded and caution exercised when undertaking the search. Any social media search should be conducted only using information available in the public domain and from school accounts where possible. It must not be done by covertly creating a profile to link/connect with the individual and gain access associated with friends/family this would be a breach of the individual human rights. Any information obtained through social media must be strictly relevant to the search criteria only. If information is found that warrants further consideration, verifying this information using a reliable source such as references should be sought if possible; social media evidence may be unreliable.

### *What information should I communicate to candidates?*

Applicants should be advised within the text of adverts, job description and application forms that a search may be undertaken on information in the public domain and encouraged to disclose anything that may be relevant to their application.

Consideration should be taken on wording of this text to not put off legitimate applicants on roles and linking this naturally with other safer recruitment employment clearances.

### *Internal Applicants*

Online searches for internal applications should consider whether a previous search was completed, how long a person has been in post, and a differentiation in role would require an online search if one has not previously been completed as part of the original recruitment process.

## Part One – The Search

- It is important to accurately record the date the search process was undertaken and attempt to complete the search process for a candidate on the same day. If information is captured, for example by screenshot, this should also be captured on the date the search was undertaken however, if not the date the screen-shot was taken must be recorded on the document.
- Similarly it is important to detail the full name of the candidate as per the application form.
- The same search engine should be used for all searches. List which you choose (for example [www.google.com](http://www.google.com)).
- The specific searches conducted on a candidate should be listed clearly.
- The specific search terms used may be expanded based on the information provided in the candidate's application form. For example, if the candidate makes reference to volunteering for an organisation (i.e. Scouts, Brownies etc) you may wish to conduct a search for the term "full candidate name + Scouts".
- Schools should undertake particular care to mitigate any potential risks surrounding accuracy, or privacy or discrimination in line with the Human Rights and Equalities Acts. As previously stated, there would need to be a legitimate interest to capture any data. If the searches return for example, an applicant's sexuality, ethnicity or any other protected characteristic under the Equality Act 2010, this information should be dismissed and should never be a factor in deciding whether they are a suitable candidate. The independent "searcher" should make every attempt to remove information of this nature from any evidence captured before passed to the panel.

### Part One - The Search Results

- After completing the search process for a candidate the "searcher" should consider the information obtained and its relevance to the candidates' suitability to work with children **only**.
- Cross-check information found against all other information held e.g candidate application form/references etc. and identify other sources to objectively verify publicly available information.
- The "searcher" should select whether they feel the results find:
  - **No concerns** - If no concerns were identified the form should be passed to the interview panel and the date recorded.
  - **Concerns Identified** - If concerns have been identified, the remainder of part one of the form must be completed before passing the form and findings to the interview panel. The "searcher" should:
    - indicate the nature of the concern identified
    - pull together any supporting evidence/documentation that illustrates the concerns
    - provide a brief rationale around the concerns identified

The form and any additional documentation should be passed to the interview panel and the date recorded.

## Part Two – Interview Panel Enquiries with the Candidate

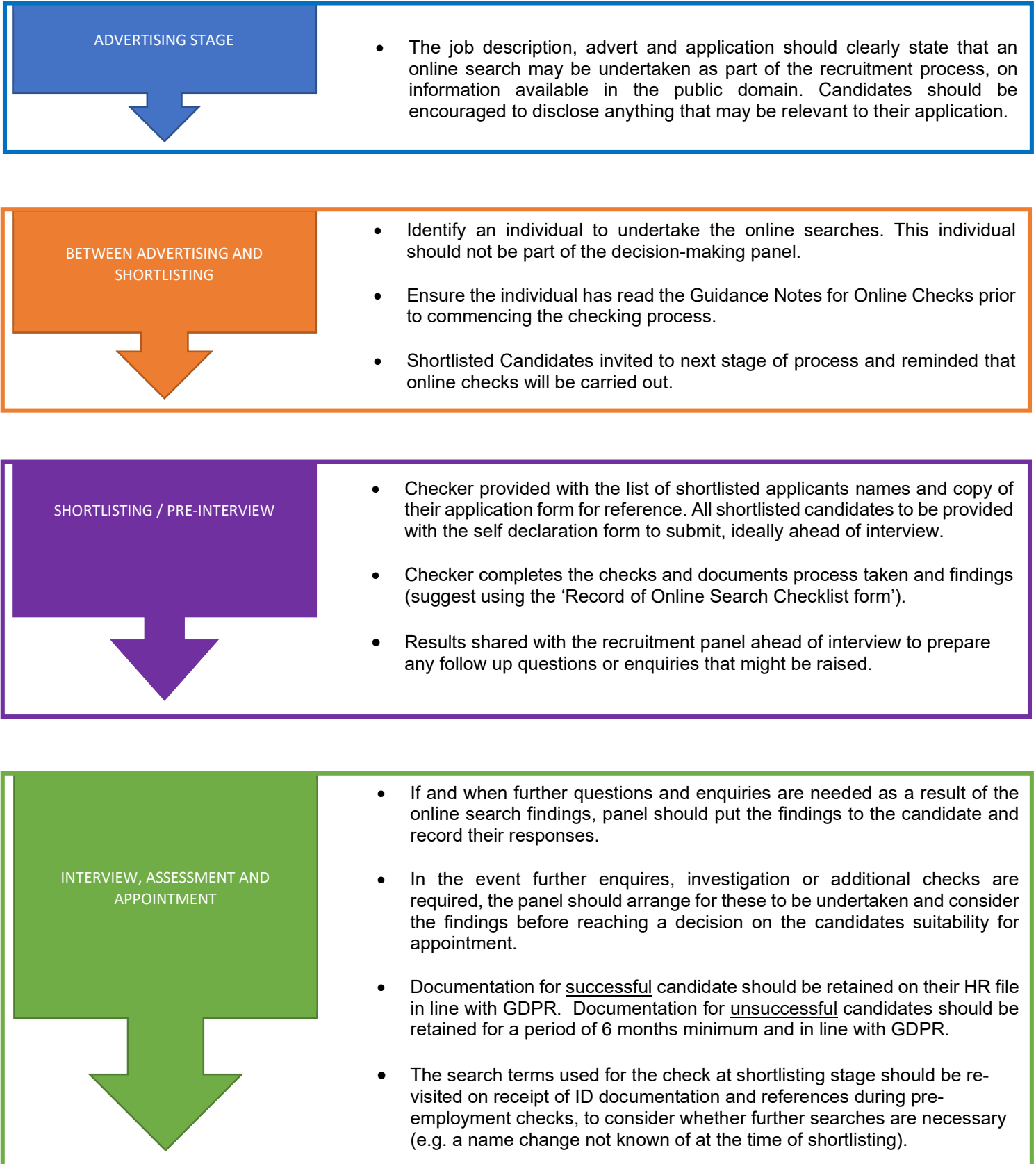
Part two of the form is designed to support the interview panel in capturing the process followed and enquiries made when concerns are identified during part one of the online search process.

- Prior to the interview and assessment stage, the panel should consider the findings of the searches and decide how they intend on making further enquiries with the candidate. There may be occasions where due to the nature of the information, the Panel Chair should contact the candidate to discuss in advance of the interview / assessment stage.
- It is common to ask candidate specific questions at interview after asking the structured questions put to each candidate. It is therefore a suitable opportunity to ask the candidate to provide their

view on any information that the panel have concerns about, resulting from the online search process.

- The responses given by the candidate should be captured and the questions asked should be open and allow the candidate sufficient opportunity to share information with the panel.
- Following the interview process the panel should consider the candidates responses and reach a decision as to whether:
  - All concerns were addressed suitably – no further action required
  - Concerns remain
- In the case where no further action is needed, the panel decision should be recorded on the form and the form signed and dated by the panel chair.
- In the case that concerns still remain, the panel should consider if any further evidence can be obtained that will alleviate their concerns. For example, if approaching a third, previous employer for a reference would confirm information about the candidate then agreement should be sought from the candidate and the reference be obtained.
- The panel must reach a final decision on the candidates' suitability to work with children based on the evidence held and resulting from online searches and subsequent enquiries. Decisions should never be solely made on information found online. In order to decide, the information must be verified with the candidates and where possible with a reliable source. Decisions should always be made using reasonable, unbiased and objective decision making.
- Clear evidence of any decision to withdraw the offer of an interview or to not make an offer of employment should be clearly documented and communicated with the candidate. We would encourage discussions with your HR Professional before making a final decision.
- Online searches should be securely retained confidentially in accordance with GDPR; the recruitment process documentation should be held for 6 months after interview then confidentially destroyed. For a successful candidate the online search outcome should be retained on the employee's personal file and retained alongside all other employment record retention periods. The outcome should be recorded, but only information relevant to their ongoing employment relationship should be retained. It is recommended that you record an online search was undertaken on the school SCR.

This flowchart offers a suggested approach to completing online searches for shortlisted applicants and advice on how to inform candidates online searches form part of safeguarding arrangements in your organisation. At any stage HR Advice can be sought on how best to proceed.



This flowchart has been produced in line with [Keeping Children Safe in Education \(KCSIE\)](#)