

P01: Safeguarding and Child Protection (Related Document)

Recruitment, Selection and Disclosure Procedures

INTRODUCTION	2
DEFINITIONS	2
Roles and responsibilities	3
EQUAL OPPORTUNITIES.....	5
PLANNING, ADVERTISING AND SHORTLISTING.....	5
INVITATION TO INTERVIEW	7
PRE-INTERVIEW CHECKS	8
ONLINE SEARCHES.....	9
THE INTERVIEW	9
AFTER THE INTERVIEW	10
PRE-APPOINTMENT CHECKS.....	10
Volunteers.....	11
Candidates who have lived outside the UK.....	12
Contractors and agency staff.....	12
Trainee/student teachers.....	12
Existing staff.....	13
Governors.....	13
AFTER THE PRE-APPOINTMENT CHECKS.....	14
SINGLE CENTRAL RECORD (SCR).....	14
INDUCTION	15
SAFER RECRUITMENT TRAINING	15
MONITORING AND REVIEW.....	15
APPENDIX 1: RECRUITMENT AND INDUCTION CHECKLIST.....	16
Recruitment checklist.....	16
Induction checklist.....	19
APPENDIX 2: LIST OF VALID IDENTITY DOCUMENTS	20
APPENDIX 3: FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS.....	21

INTRODUCTION

Safeguarding and promoting the welfare of children and young people is an integral factor in the School's recruitment process and plays an essential part in creating a safe environment for children and young people.

This document sets out the duties and responsibilities of all staff within the School in relation to recruiting and vetting staff, contractors and volunteers and for providing a safe learning environment.

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

- Children Act 1989
- Children Act 2004
- Disqualification under the Childcare Act 2006 (DUCA)
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- The School Staffing (England) Regulations 2009
- Rehabilitation of Offenders Act 1974
- Education and Skills Act 2008
- Data Protection Act 2018
- The General Data Protection Regulation (GDPR)
- Education Act 2002
- Equality Act 2010

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

- DfE (2020) 'Keeping children safe in education' September 2022
- DfE (2021) 'Staffing and employment advice for schools'
- DfE (2019) 'Governance handbook'
- Education (Independent School Standards) Regulations 2024 (ISSRs)
- Prevent Duty Guidance for England and Wales 2015 (the Prevent Guidance)
- Guidance or code of practice published by the Disclosure and barring Service (DBS)

This document must be read in conjunction with the following School policies:

- 01 Safeguarding and Child Protection Policy (and appropriate related documents)
- 13 Equal Opportunities Policy (and appropriate related documents)
- 14 Data Protection Policy (and appropriate related documents)
- 16 HR and Employment (appropriate related policy documents)

This document does not form part of any member of staff's contract of employment and may be amended at any time.

DEFINITIONS

Regulated activity – includes:

- Teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children.

- Working for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work undertaken by supervised volunteers.
- The above definitions are classified as regulated activity if they are:
 - undertaken regularly, meaning once a week or more;
 - overnight, meaning between 2.00am and 6.00pm; or
 - satisfies the "period condition", meaning four times or more in a 30-day period; and
 - provides the opportunity for contact with children
- Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes relevant personal care, or health care provided by, or under the supervision of, a health care professional. Personal care includes helping a child with eating or drinking for reasons of illness or disability, or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability. Health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.
- Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

Teaching role – refers to a role involving planning and preparing lessons and courses for pupils; delivering lessons to pupils; and assessing and reporting on the development, progress and attainment of pupils. These activities are not teaching work for the purposes of 'Keeping children safe in education' (KCSIE) if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Head to provide such direction and supervision.

Standard DBS – this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer, regardless of whether or not they are spent under the Rehabilitation of Offenders Act 1974., other than "Protected" convictions and cautions.

Enhanced DBS – this provides the same information as the standard DBS, plus any additional information held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed.

Children's barred list – This checks the children and vulnerable adults 'barred list' to see if a person appears on this list and is prohibited from working with these groups..

Section 128 check – this provides for the Secretary of State to direct that a person may be prohibited or restricted from participating in the management of an independent school (which includes academies and free schools). A person prohibited under section 128 is also disqualified from holding or continuing to hold office as a governor of a maintained school.

Safer recruitment – this is the safeguarding and protection of pupils during the recruitment and selection process. Its overall purpose is to help identify and deter or reject individuals who are deemed to be at risk of abusing children.

Roles and responsibilities

The governing body (the Council) is responsible for:

- Agreeing and monitoring effective policies to ensure recruitment at the school is in accordance with the legislation outlined in the Introduction.
- Ensuring that staff recruitment is as safe as possible, as well as fair and compliant with the relevant legislation.

- Ensuring appropriate checks have been carried out on staff, volunteers, contractors and agency workers working within the school.
- Appointing an appropriate recruitment panel.
- Ensuring that at least one member of the recruitment panel has undergone safer recruitment training.
- Ensuring that all members of the recruitment panel understand their role, i.e. advisory or decision making.
- Monitoring the advertising of vacancies, assessing how they are being advertised and whether the adverts are maximising all of the opportunities to attract the appropriate candidates.
- Benchmarking the success of any advertising methods used, as well as the overall success of the recruitment process.
- Ensuring a member of the board is on the recruitment panel for a new Head.
- Ensuring that all members of the recruitment panel are familiar with their obligations with regards to safer recruitment, as set out in KCSIE.
- Monitoring the school's SCR to ensure that the necessary vetting checks for employees are carried out.
- Ensuring that equal opportunities are established and implemented throughout the recruitment process.
- Ensuring that the salary of the successful candidate is determined.
- Accommodating the needs of new employees and making reasonable adjustments when necessary.
- Ensuring that the DPO reviews this policy and that any recruitment data that is kept is in accordance with the School's Data Protection Policy.

The recruitment panel is responsible for:

- Creating the advert and ensuring it meets all the necessary post requirements.
- Shortlisting the potential candidates with the aim of reducing the application field and identifying those with the potential to effectively undertake the role.
- Appropriately delegating responsibility for recruitment to the Head (or Bursar as appropriate).
- Ensuring that the interview addresses leadership ability, team working skills, reasons for interest in joining the school, integrity, understanding of the school's ethos and vision, and why the candidate believes they would be a good fit for the school.
- Ensuring that the interview addresses safeguarding practices.
- Agreeing with the successful candidate when other members of the school community will be informed about their appointment, including staff members and parents.

The Head is responsible for:

- Ensuring appropriate checks have been carried out on prospective staff, volunteers, contractors and agency workers working within the school.
- Ensuring that appropriate supervision of employees/volunteers is organised, and for promoting the safety and wellbeing of pupils generally and throughout the recruitment process.
- Leading the interview when the candidate is at a lower level than Head, or delegating responsibility for leading the interview to the Bursar or other members of the Executive Team as appropriate.

During the recruitment process, and especially during the initial stages, the recruitment panel and the Head will be watchful of candidates displaying the following characteristics:

- No understanding or appreciation of children's needs
- Expressing that they want the role to meet their needs at the expense of children

- Using inappropriate language in relation to children
- Expressing extreme views or views that don't support safeguarding practices
- Displaying unclear boundaries with children
- Providing vague answers when asked about their experience and being unable to explain gaps in their employment

EQUAL OPPORTUNITIES

When recruiting, the school will adhere to its Equal Opportunities Policy.

The school will not discriminate against any protected characteristics, such as disability or gender, and will always promote difference and inclusion throughout the school.

The school will, where necessary, make reasonable adjustments to ensure the interview is accessible to all candidates. Candidates should inform the school of any reasonable adjustments that they need when they receive the invitation for an interview.

The governing board will review recruitment procedures annually to ensure they are accessible and do not directly or indirectly discriminate against candidates.

Candidates will not be asked about their health or any disabilities before a job offer is made, unless one of the following exemptions applies:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments)
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment
- Positive action to recruit people with disabilities
- Equal opportunities monitoring (which will not form part of the decision-making process)

PLANNING, ADVERTISING AND SHORTLISTING

Once a vacancy has been identified, the school will allow an appropriate amount of time for planning and structuring the recruitment process.

The Head and/or members of the Executive Team will:

- Decide on the recruitment timeframe.
- Decide who will be involved in the process and what their roles will be, e.g. who forms the recruitment panel and who will lead interviewing.
- Support the preparation of documents that will be provided to applicants, including the job pack, job description and person specification – ensuring that these documents contain a clear message about safeguarding, the checks that will be carried out and that references will be sought.

The job information and associated documents will be published on the school website.

The full requirements of the role will be clearly explained, including the safeguarding responsibilities of the role and any employment vetting requirements such as a DBS check.

The recruitment panel will comprise at least two, ideally three, members of staff, with the Head / Bursar usually being one of these (where the Head is not available or the post is a support role appointed by at least one member of the Executive Team will be on the recruitment panel). Where possible, the recruitment panel will be an odd number so majority votes can be cast.

At least one member of the recruitment panel will have successfully completed up-to-date safer recruitment training.

The recruitment panel will ensure the advertisement includes the following requirements:

- Information specific to the role on offer and the school as a whole;
- The safeguarding responsibilities of the post (reflected in the job description and person specification in this respect); and whether the post is exempt from the Rehabilitation of Offenders Act 1974;
- The benefits of the role;
- The school's commitment to safeguarding and that safeguarding checks will be undertaken;
- The advertisement and application process is communicated directly and concisely, and includes a clear call to action.

The recruitment panel will also ensure that application packs include the following:

- Any equal rights material, e.g. an equal opportunities statement
- A brief outline of the school, its values and aims

All applications are replied to in writing (normally by email) notifying candidates whether they have been shortlisted or not.

Interviews are arranged for the shortlisted candidates.

Where appropriate, vacancies will be advertised through external media, with due consideration to the school's Equal Opportunities Policy, ensuring that the advertisement reaches a wide range of groups.

Advertisements will contain a statement of commitment to ensuring equal rights.

Advertisements will include a job description, person specification and detail the closing date.

The contact email of the HR department and details of the application process will be clearly outlined.

Application forms will be accessible via the school's website.

The school may utilise social media for recruitment, and if doing so, will create a social media recruitment strategy to ensure that the advertisement is reaching the right people and is communicating the ethos of the school effectively.

All applicants for employment will be required to complete an application form. The school will never accept a CV alone.

When shortlisting candidates for an interview, all application forms will be considered.

Candidates who are shortlisted will meet all the essential aspects of the person specification requirements.

The school will conduct a shortlisting exercise by reviewing all application forms received in order to determine which applicants will be invited for interview. At least two members of the recruitment panel will be involved in the shortlisting exercise.

Applicants will be assessed against the same shortlisting criteria to ensure a fair process.

INVITATION TO INTERVIEW

Shortlisted applicants will be invited to attend a formal interview at which their skills and experience will be discussed in more detail. All shortlisted applicants will be questioned at interview about their suitability to work with children.

All shortlisted applicants will be required to complete a "Suitability to work with children self-declaration form" prior to interview in which they will be asked to provide information about their criminal records history and other factors relevant to their suitability to work with children. This information will be considered and discussed with applicants at interview.

HR will ensure that all shortlisted candidates receive information about the interview arrangements, how they will be conducted, the areas that will be explored and what documents they should bring.

References

Where possible, HR will obtain two references prior to interviewing candidates to allow for any concerns to be explored with the referee and discussed with the candidate. One reference will be from the candidate's current / most recent employer. The second reference should be from the employer with whom the applicant most recently worked with children. Neither reference should be a relative or someone known to the applicant as a friend. All references received from a school must be signed / countersigned by the Head of that school.

Open testimonials will not be relied upon, nor will information that has been provided by the candidate without verifying the information.

Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving will be obtained from the employer.

Electronic references will be vetted to ensure they originate from a credible source.

References from internal candidates will also always be scrutinised before interview.

Permission will be sought from the candidates before HR contact referees.

Structured questionnaires will be used to question referees and the recruitment panel will determine the questions on a case-by-case basis.

Information about past disciplinary action or allegations that are disclosed will be considered carefully when assessing the applicant's suitability for the post.

The candidate's current employer will be asked for details of any capability history in the previous two years, including the reasoning.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe the applicant is unsuitable to work with children.

HR will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

The School treats all references given or received as confidential which means that the applicant will not usually be provided with a copy.

PRE-INTERVIEW CHECKS

The HR department will complete the necessary pre-interview checks.

Pre-interview checks will include the following:

- Two references from each shortlisted candidate directly from the referees – where possible, one reference will be obtained relating to the role in which the candidate worked with children
- Qualifications or experience relevant to the post
- Criminal records history

Criminal records checks

Prior to 29 May 2013 an enhanced disclosure contained details of all convictions on record (including those defined as “spent” under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police national Computer. It could also contain non-conviction information from local police records which a chief police officer considered relevant to the role applied for at the School.

DBS filtering rules

With effect from 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The filtering rules developed by the DBS and the Home Office designate certain spent convictions and cautions as “protected”. “Protected” convictions and cautions are not included in a DBS certificate and job applicants are not required to disclose them during the recruitment process. It is unlawful for the School to take into account a conviction or caution that should not have been disclosed.

If a protected conviction or caution is inadvertently disclosed to the School during the recruitment process it will be disregarded when making a recruitment decision.

A conviction will always be disclosable if it was imposed for a “specific offence” committed at any stage. A caution issued for a “specific offence” committed over the age of 18 will always be disclosable. However, a caution issued for a “specific offence” committed under the age of 18 is never disclosable. “Specified offences” are usually of a serious violent or sexual nature, or are relevant for safeguarding children and vulnerable adults.

The filtering rules have recently been updated and work as follows:

For those age 18 or over at the time of the offence

A spent criminal conviction for an offence committed in the United Kingdom when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by the job applicant), if:

- Eleven years have elapsed since the date of the conviction;
- It did not result in a custodial sentence; and
- It was not imposed for a “specific offence”

A spent caution for an offence committed when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant) if:

- Six years have elapsed since the date it was issued; and
- It was not issued for a “specific offence”

For those aged under 18 at the time of an offence

A spent criminal conviction for an offence committed in the United Kingdom when a person was under the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by the job applicant), if:

- Five and a half years have elapsed since the date of the conviction;
- It did not result in a custodial sentence; and;
- It was not imposed for a "specific offence".

A caution issued for an offence committed when a person was under the age of 18 will never be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant).

ONLINE SEARCHES

KCSIE suggests that schools should conduct online searches during recruitment. At STAHS, we conduct online searches on candidates who have been shortlisted, prior to interview, and we follow a strict and consistent procedure.

The purpose of the search is to identify whether candidates:

- are unqualified for the role
- have inconsistencies in their employment history
- pose a potential safeguarding risk
- risk damaging the reputation of our School

If concerns are identified related to the points above, they are passed onto the interview panel. Any concerns raised will not contain any irrelevant personal information.

The search is conducted by someone who is not involved in shortlisting or interviewing for the role to minimise the risk of bias.

The search follows a consistent checklist for each candidate. This checklist contains specific search terms and social media sites to be reviewed by the person conducted the online search. A record is kept of each search and all data complies with GDPR requirements.

THE INTERVIEW

During the interview process, candidates will be asked standard questions and their responses will be recorded for ease of comparison. Any concerns raised through contact with referees will also be discussed with the candidate at this stage.

The recruitment panel will ask open questions to assess the candidate's experience and suitability for the post, and to explore the candidate's motivation towards safeguarding and their suitability to work with children. The candidate will be given the opportunity to discuss any concerns or ask any questions.

When possible, the interview will always comprise a face-to-face interview (in exceptional circumstances we may conduct interviews remotely due to the COVID-19 pandemic and government guidelines at the time, and the areas which it will explore will include suitability to work with children); however, the recruitment panel may also request that candidates complete one of the following exercises:

- Presentations
- Group exercises
- Written exercises

- Aptitude/ability tests
- Observed teaching
- Getting the candidate to work in supervised activity with pupils

All candidates invited to interview must also bring each of the following items with them, one document must be photographic ID and one must confirm their current home address.

- A passport or current driving licence (including photograph). If interviews are conducted remotely, candidates will be required to scan and email a copy of this to the HR Department ahead of their interview. (Where an applicant claims to have changed their name by deed poll or any other means, they will be required to provide documentary evidence of the change).
- Their birth certificate.
- A utility bill or financial statement issued within the last three months showing the candidate's current name and address.
- Where appropriate any documentation evidencing a change of name.
- Evidence of right to work in the UK.
- Qualification certificates confirming any educational and professional qualifications that are necessary or relevant for the post (e.g., the original or certified copy of certificates, diplomas etc).

HR will take a copy and verify that the ID is a true likeness of the candidate.

Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualification must be obtained by you from the awarding body. Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

In addition, as part of the shortlisting process HR may carry 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 could be explored with the candidate at interview.

AFTER THE INTERVIEW

After the interview has been completed, the recruitment panel will:

- Assess all candidates' performance using the same agreed criteria.
- Contact and provide feedback to the unsuccessful candidates – feedback will be verbal and based on evidence of their performance against the person specification for the role.

Candidate assessment materials will be held securely by HR for an appropriate amount of time after the interviews, in line with the Data Protection Policy, in case any aspect of the recruitment process is challenged.

After choosing a successful candidate, the school will:

- Make a conditional offer of employment to the candidate.
- Ask the successful candidate to provide identification and proof of qualifications, if this has not already been done.
- Complete the relevant pre-appointment checks.

PRE-APPOINTMENT CHECKS

All appointments will be conditional on satisfactory completion of the necessary pre-appointment checks in accordance with the recommendations set out in KCSIE and DUCA and includes the following:

- If not already received, verify the candidate's identity, address and qualifications (original documents must be seen)
- For positions which involve "teaching work", information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency which renders them unable or unsuitable to work at the school.
- Where the position amounts to regulated activity obtain an enhanced DBS certificate (via the applicant)
- For applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable to work at the School.
- Where a position amounts to regulated activity obtain a separate Children's' Barred List check
- Verify a candidate's mental and physical fitness to carry out their role
- Verify the person's right to work in the UK
- Receipt of two satisfactory references
- Ensure the application form was fully completed and verify applicant's full employment history
- Information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at the School
- Verify the candidate is not disqualified from working with children under 8 (where appropriate)
- For those in management, trustee or governor roles, a section 128 check will be carried out
- Any further checks which the School decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.

If the school has reason to believe that an individual is barred, it is an offence under section 9 of the Safeguarding Vulnerable Groups Act (SVGA) 2006 for the school to allow the individual to carry out any form of regulated activity.

Although there is no requirement to do so, the School will obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK even if, in the three months prior to their appointment, the applicant has worked:

- In a school in England in a post which brought them into regular contact with children or young persons; or
- In any post in a school since 12 May 2006 which did not bring the person into regular contact with children or young persons.

Volunteers

Volunteers not engaging in regulated activity will not require an enhanced DBS check or a barred list check.

If volunteers are engaging in regulated activity and are new to the school, an enhanced DBS check with a barred list check will be required.

Existing volunteers in regulated activity do not need to be re-checked if they have already had a DBS check (including barred list information); however, the school may decide to conduct a repeat DBS check.

If a volunteer is not in regulated activity, the school will use its professional judgement, after conducting a risk assessment, to determine whether to seek an enhanced DBS check, but no barred list check will be required.

Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils.

Candidates who have lived outside the UK

No exceptions will be made for candidates who have lived outside of the UK (more than 3 months in last 5 years since the age of 18). DBS checks and all mandatory checks outlined in this policy will be carried out, along with additional checks where necessary. The School will take account the "DBS unusual addresses guide" in such circumstances. When requesting such information, the School has regard to relevant government guidance and will therefore always require the applicant to apply for a formal check from the country in question i.e. a criminal records check (or equivalent) or a certificate of good conduct.

In addition, where an applicant for a teaching position has worked as a teacher outside of the UK, the School will ask the applicant to obtain from the professional regulating authority of the teaching profession in each country in which they have worked as a teacher, evidence which confirms that they have not imposed any sanctions or restrictions on the applicant and that they are not aware of any reason why the applicant may be unsuitable to work as a teacher. The school will also ask shortlisted applicants (and their referees) to disclose whether they have ever been referred to, or are the subject of a sanction issued by, the regulator of the teaching profession in the countries in which they have carried out teaching work.

Sanctions and restrictions issued by the regulating authority of another country will not prevent a person from working as a teacher at the School. However, the School will take all relevant information into account in determining whether an applicant is suitable to work at the School.

The School may allow an applicant to commence work pending receipt of a formal check from a particular country if it has received a reference and / or letter of professional standing from that country, and considers the applicant suitable to start.

If no information is available from a particular country the School may allow the applicant to commence work. The School will take proportionate risk-based decisions on a person's suitability in these circumstances.

Contractors and agency staff

In the case of any employee working at the school who is sourced from an agency or third-party contractor, confirmation must be obtained from the organisation, in writing, that all necessary checks have been satisfactorily completed.

Confirmation will also be obtained that the individual who presents for work is the same person on whom all checks have been completed.

Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.

If a contractor is self-employed, the school will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

On the first on-site day, the individual must bring in photo ID and their DBS certificate. A copy of their photo ID will be retained on site and a note of the date the DBS certificate was seen will be recorded.

Trainee/student teachers

The school will ensure that enhanced DBS certificates and barred list checks are obtained on all salaried applicants for initial teacher training who are in regulated activity.

Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks.

The individual must bring with them on, or before, their first day on-site photo ID and their original DBS certificate.

Visiting speakers and the Prevent Duty

All visiting speakers will be subject to the School's usual visitors' protocol. This will include signing in and out at Reception, the wearing of a visitor's badge at all times and being fully escorted by a fully vetted member of staff. In doing so the School will also have regard to the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE.

The School may obtain a DBS disclosure or Children's Barred List information on any visiting speaker who engages in regulated activity at the School or performs any other regular duties for or on behalf of the school which brings them into regular contact with pupils.

The School will also obtain such formal or informal background information about the visiting speaker as is reasonable in the circumstances to decide whether to invite and / or permit a speaker to attend the School.

Existing staff

If a member of staff moves from a post that was not regulated activity to one that is, the relevant checks will be carried out.

The recruitment panel will carry out further checks where there is a concern about a member of staff's suitability to work with children.

An investigation will be carried out to gather enough evidence to establish if an allegation has a foundation. The employer of the school will ensure they have sufficient information to meet the referral duty criteria in this policy.

The school will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- The harm test is satisfied in respect of that harm.
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence.
- The individual is deployed to another area of work not in regulated activity, or where they have been suspended.

Referrals to the DBS will be made on conclusion of an investigation where an individual has been removed from regulated activity.

Referrals to the DBS will be made as soon as possible after the resignation, removal or redeployment of the staff member.

Governors

All individuals appointed to the governing body will be subject to a section 128 direction check. The School will request an enhanced DBS certificate (which the School obtains for all posts at the School which amount to regulated activity) which includes a barred list check on an individual as part of the appointment process for governors.

Associate members will not be asked to undertake a DBS check.

In addition, the School asks all shortlisted applicants whether they have ever been the subject of a referral to the Department for Education, or are subject to a section 128 direction or any other sanction which prohibits, disqualifies or restricts them from being involved in the management of an independent school.

Under the Charities Act 2011 it is a criminal offence for a person to act as a trustee or senior manager of a charity when disqualified from doing so. Disqualification from acting as a charity trustee or senior manager includes various spent and unspent criminal offences and other sanctions. There is no single list or register that covers all of the disqualification criteria and the School therefore adopts a pragmatic approach to checking whether a person is disqualified. This is achieved by the use of a self-declaration form and the checking of relevant publicly accessible registers.

A failure to disclose relevant information, which subsequently comes to the School's attention may result in the termination of an appointment as a governor or senior manager.

POLICY ON RECRUITMENT OF EX-OFFENDERS

The School will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. The School makes appointments on the basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the School. Each case will be decided on its own merits following an objective assessment of the conviction which will include:

- Whether the conviction or other matter revealed is relevant to the position in question
- The seriousness of any offence or other matter revealed
- The length of time since the offence or other matter occurred
- Whether the applicant has a pattern of offending behaviour or other relevant matters
- Whether the applicant's circumstances have changed since the offending behaviour or other relevant matters: and;
- The circumstances surrounding the offence and the explanation(s) offered by the applicant.

AFTER THE PRE-APPOINTMENT CHECKS

Once the pre-employment checks have been completed, the recruitment panel will agree a start date with the candidate.

The School will submit contractual paperwork, including initiating a DBS check, Barred List check, pre-employment medical enquiry form, Overseas Declaration form and Under 8's declaration form (where applicable).

All required details of the checks carried out will be added to the school's SCR.

Starting work pending receipt of the DBS disclosure

If there is a delay in receiving a DBS disclosure the Head has the discretion to allow an individual to begin work pending receipt of the disclosure certificate. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once appropriate supervision has been put in place.

SINGLE CENTRAL RECORD (SCR)

The school will maintain and regularly update the 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, including volunteers and governors.

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 and the initials of the checker:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check, where applicable
- Further checks on people living or working outside the UK,
- A check of professional qualifications, where applicable
- A check to establish the person's right to work in the UK
- A check to establish the person's medical fitness
- For those in management, trustee or governor roles, a Prohibition from Management 128 Check
- 2 satisfactory references
- Fully completed application form
- 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 not required based on the role, for example volunteers or governors, this will be recorded as not applicable in the SCR.

INDUCTION

All staff who are new to the school receive induction training including safeguarding policies, guidance on safe working practices and health and safety information. The purpose of the induction is to:

- Provide training and information about our policies and procedures
- Support individuals in a way that is appropriate for the role for which they have been engaged
- Confirm the conduct expected of staff within the school
- Provide opportunities for a new member of staff or volunteer to discuss any issues or concerns about their role or responsibility
- Enable the person's line manager or supervisor to recognise any concerns or issues about the person's ability or suitability at the outset and address them immediately

SAFER RECRUITMENT TRAINING

At least one member of the recruitment panel will have completed formal safer recruitment training.

As a measure of good practice, the school will ensure that this training is renewed every five years.

MONITORING AND REVIEW

This document is reviewed annually by the governing body and the Executive Team as part of the review of 01 Safeguarding and Child Protection Policy.

APPENDIX 1: RECRUITMENT AND INDUCTION CHECKLIST

Recruitment checklist

Action	Date completed	Completed by (initial)
Identify need for vacancy / new role		
Recruitment approved by Head or Bursar		
Draft job description and person specification		
Does the position amount to "regulated activity" Yes / No		
Advertisement placed externally job board / paper		
Identify interview panel members and plan interview day, including the development of interview questions and tasks. (At least 1 panel member to be trained in Safer Recruitment. Safeguarding questions to be developed and asked to assess suitability to work with children and radical political view points)		
<p>Vacancy placed on School website Staff notified via email Documents uploaded onto website:</p> <ul style="list-style-type: none"> • job description & person specification • application form • equal opportunities monitoring form • recruitment, selection and disclosure policy • child protection policy • school information (as appropriate) 		
<p>Receive and log completed application form & covering letter</p> <ul style="list-style-type: none"> • send email confirming receipt, request confirmation of DfES number • Check that a full employment history has been provided. If not, or if any gaps in the candidate's employment history seek explanation from the candidate. • Check that a written record of the applicant's explanation for any gaps has been retained by the School. 		
<p>Complete shortlisting assessment form</p> <p>Copy all applications and send an electronic pack for each panel member for shortlisting purposes</p>		
<p>Invite shortlisted candidates to interview</p> <ul style="list-style-type: none"> • Prepare an individual interview schedule • Prepare teaching task form (with support of teaching staff) • Prepare and send an email inviting each candidate to interview (attach interview schedule, teaching task and Suitability to work with Children Self-Declaration form) 		

Action	Date completed	Completed by (initial)
Send rejection letter to candidates not invited to shortlist		
Send reference request letter and form (if references sought at this stage - no questions can be asked about health or disability)		
Interview Day - received from applicant and copied: <ul style="list-style-type: none"> • Evidence of identity and address (hardcopy of photo ID and, preferred Passport & Birth Certificate) • Marriage certificate/deed poll certificate, if name changed • Evidence of qualification, if required • Evidence of right to work in the UK 		
Appointment assessment completed: Collating interview notes, observed lesson feedback and completed in-tray documentation		
Written Conditional Offer made to: _____ <ul style="list-style-type: none"> • Review "Suitability to work with children Self-declaration form". Check whether it discloses any information. If it does, consider whether the appointment can proceed. • Prepare offer of employment letter and send to applicant including; <ul style="list-style-type: none"> ○ Contract of Employment ○ Job description ○ Details of registering for online DBS disclosure check ○ Medical Fitness Questionnaire ○ Staff Registration Form ○ Pre-Appointment Checklist ○ Childcare Disqualification Self-Declaration Form (for relevant roles in Early or Later Years Provision only) ○ Request verification of professional qualifications if not already received ○ Overseas self-declaration form ○ If application form indicates the applicant has lived or worked abroad consider whether overseas checks will be required. ○ For teaching posts, an applicant who has taught overseas, are required to obtain evidence of their professional conduct from the regulator of the teaching profession in each relevant country worked. 		
Childcare Disqualification Self-Declaration Form (where appropriate) - Check whether it discloses any information which could result in disqualification. If it does, consider whether the appointment can proceed and/or whether a waiver application is necessary or whether the offer should be withdrawn		
Barred List Check		

Action	Date completed	Completed by (initial)
Original Overseas checks or evidence of professional standing from the regulator of the teaching profession for applicant who has taught overseas seen by HR – initial a copy and then file		
Check that no prohibition order has been issued by the Secretary of State		
Send reference request letter and form (if not already completed at shortlisting stage) NB: the reference request letter asks all referees to state any known reason why the candidate is unsuitable to work with children and that there should be no material misstatement or omission relevant to the suitability of the applicant		
First reference seen by HR - Copy shown to Head/Head of Prep/Bursar Are there any gaps, inconsistencies or anomalies in the information provided? Make direct telephone inquiry of first referee to verify the reference (advisory only) Reference approved Yes / No		
Second reference seen by HR - Copy shown to Head/Head of Prep/Bursar Are there any gaps, inconsistencies or anomalies in the information provided? Make direct telephone inquiry of second referee to verify the reference (advisory only) Reference approved Yes / No		
Proceed with the recruitment?		Yes / No
Original DBS disclosure certificate seen by HR – initial a copy (noting date initialled by HR on Central Register) and then destroy the copy. If appropriate, complete DBS disclosure assessment form		
DBS reference number: _____		
Does the DBS disclosure contain any information about the applicant being subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent school? If yes, refer to the Head. <i>Can the appointment proceed? YES / NO</i>		
Safeguarding Spreadsheet - <u>Add staff member to spreadsheet</u>		
Prepare a Starter Form via SHAREPOINT and send to IT		
Give the Payroll Supervisor a copy of: Offer letter Staff Registration form		
Add staff member to Single Central Record		

Induction checklist

Induction process	Date completed	Completed by (initial)
<p>Pass details of the new member of staff to the Deputy Head Pastoral for the following: (Register start date of new member of staff)</p> <ul style="list-style-type: none"> • Successfully undertaken training on the School's child protection policy • read Annex A • have received other policies integral to Safeguarding such as the Pupil Behaviour Policy, Children Missing in Education Policy, BYOD Policy, Staff AUP and Staff Code of Conduct, Whistleblowing Policy • been informed of the identity of the Designated Safeguarding Lead • undertaken training on the Staff code of conduct • been given a copy of part one of <i>Keeping Children Safe in Education</i> to read • confirmed that they have read and understood part one of <i>Keeping Children Safe in Education</i> to read • undertaken child protection training in accordance with LCSB requirements • all other school based training as required and relevant to the role 		

APPENDIX 2: LIST OF VALID IDENTITY DOCUMENTS

Group 1: Primary identity

- Current valid passport
- Biometric residence permit (UK)
- Current driving licence (photo card)(full or provisional UK / Isle Man and Channel Islands
- Birth certificate (UK & Channel Islands: issued at the time of birth (within 42 days of date of birth; full or short form acceptable including those issued by the UK authorities overseas, such as Embassies, High Commissions and HM Forces)
- Adoption certificate (UK and Channel Islands)

Group 2a: Trusted government documents

- Current driving licence: photocard – full or provisional (All countries outside the UK, excluding Isle Man and Channel Islands)
- Current driving licence - paper version (if issued before 1998) (full or provisional) UK, Isle of Man and Channel Islands
- Birth certificate – issued after time of birth (UK, Channel Islands and Isle of Man)
- Marriage / civil partnership certificate (UK and Channel Islands)
- Immigration document, visa or work permit – Issued by a country outside the EEA. Valid only for roles whereby the applicant is living and working outside of the UK. Visa/permit must relate to the non UK country in which the role is based
- HM Forces ID card (UK)
- Fire arms licence (UK, Channel Islands and Isle of Man)

Group 2b: Financial and social history documents

- Mortgage statements (UK) (not more than 12 months old)
- Bank /building society statement (UK and Channel Islands) (not more than 3 months old)
- Bank/ building society statement (Countries outside the UK) (not more than 3 months – branch must be in the country where the applicant lives and works)
- Bank /building society account opening confirmation letter (UK) (not more than 3 months old)
- Credit card statement (UK) (not more than 3 months old)
- Financial statement, e.g. pension, endowment (UK) (not more than 12 months old)
- P45 /P60 statement(UK and Channel Islands) (not more than 12 months old)
- Council tax statement (UK and Channel Islands) (not more than 12 months old)
- Letter of sponsorship from future employment provider (non UK only; valid only for applicants residing outside of the UK at the time of application; must be valid at time of application)
- Utility bill (UK; not mobile telephone bill) (not more than 3 months old)
- Benefit statement e.g. child benefit, pension (UK) (not more than 3 months old)
- A document from central or local government /government agency / local council giving an entitlement e.g. from the Department of Work and Pensions, the Employment Service. HM Revenue & Customs (UK and Channel Islands) (not more than 3 months old)
- EEA National ID card (must be valid at time of application)
- Irish Passport Card (Cannot be used with an Irish passport (Must be valid at the time of application)
- Cards carrying the PASS accreditation logo (UK, Isle of Man and Channel Islands; must be valid at time of applications)
- Letter from Head or College Principal (UK: for 16-19 year olds in full time education. This is only used in exceptional circumstances if other documents cannot be provided; must be valid at time of application)

APPENDIX 3: FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS

