

Safer Recruitment and Selection Policy



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SAFER RECRUITMENT AND SELECTION POLICY

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Safer Recruitment and Selection Policy

1. Claycots' School Values

The aim of Claycots School is to be a high achieving school at the heart of the community where children and staff learn effectively and everyone is valued as an individual, treated fairly and with respect. This involves providing access to medications and opportunities for all pupils without discrimination of any kind.

We aim to embed our school values in all that we do at Claycots. This policy has been written with these values in mind:

- Integrity
- Kindness
- Respect
- Curiosity

2. Overview

- 2.1 This policy covers our internal and external recruitment. It is designed to ensure that our recruitment is safe, fair, and lawful and that it leads to the right people being appointed to the right roles who are suitable to work with children.
- 2.2 We are committed making safeguarding and promoting the welfare of children an integral factor in recruitment and selection and complying with safer recruitment practices. We will do our best to follow processes that deter those who are unsuitable to work with children from gaining employment or working at the School.
- 2.3 We are an inclusive organisation which encourages applications from across society. We're committed to building a workforce of capable and committed people from all walks of life.
- 2.4 Staff who are involved in our recruitment receive relevant training to include equality and diversity.
- 2.5 Prior to the start of the recruitment process any appointment panel will include at least one person who has undertaken appropriate safer recruitment training. We will also ensure that those involved in the recruitment and employment of staff have received appropriate safer recruitment training.
- 2.6 We do all we can during our recruitment process to make sure that job applicants (people who send us job applications), candidates (those whose applications we take through to subsequent stages) and general job seekers are not disadvantaged in connection with a protected characteristic such as age, sex, race, or disability.
- 2.7 The salary offered should be determined in accordance with the relevant Pay Policy.
- 2.8 Our recruitment decisions, including speculative approaches and internal promotions and transfers, are based on merit, using non-discriminatory and as far as possible, objective criteria.
- 2.9 This policy does not form part of your employment contract, and we may update it at any time.
- 2.10 You should read this policy alongside our policies on Safeguarding, Equal Opportunities/Objectives, Data Protection/GDPR and relevant statutory guidance such as Keeping Children Safe in Education and Working Together to Safeguard Children.

3. Defining the role

- 3.1 When we need to recruit, we will carefully consider what the role involves. We will review and may update an existing job description and person specification to make sure it properly reflects the day-to-day duties and responsibilities involved.
- 3.2 The job description will describe the duties, responsibilities and level of seniority associated with the post and specific in respect of working with children.
- 3.3 For safeguarding purposes, in addition to the list of the responsibilities and tasks to be undertaken, the job description should include reference to promoting and safeguarding the welfare of children, suitability to work with children, the requirement that appropriate boundaries be maintained between adults and children, and reference to confidentiality and data protection obligations.
- 3.4 All person specifications must specify that the person employed must be suitable to work with children, demonstrate appropriate behaviours and attitude, the right motivation and values towards children, a requirement to maintain appropriate boundaries between adults and children and receive a satisfactory Enhanced DBS with barred list check, as appropriate. They will also stipulate the specific type of qualifications, training, knowledge, experience, skills, and the aptitudes and competencies required for the effective performance of the job. Person specifications should indicate how these will be tested and assessed during the selection process.
- 3.5 If we think that the role could work as a part-time, job-share or other type of flexible working arrangement, we will take that into account when we are recruiting.

4. Our job adverts

- 4.1 Job adverts are prepared by the HR Department with input from the relevant manager.
- 4.2 Our job adverts comply with equality law. In particular, we don't use wording that could discourage applications from some groups in society.
- 4.3 All adverts will make clear our commitment to safeguarding and promoting the welfare of children. They will confirm that appropriate safeguarding checks will be undertaken and confirm it is our policy to obtain references prior to interview. Adverts should reflect the key requirements of the job description and person specification to include the focus on safeguarding.
- 4.4 We may decide to advertise a vacancy internally, or externally or both. When we advertise internally, we make sure that employees who are absent because of long-term sickness or maternity leave (for example) are told about the vacancy and are given the same opportunity as their colleagues to apply.
- 4.5 We advertise vacancies in places that are accessible to as wide a pool of potentially interested job applicants as possible.

5. Your job application

- 5.1 All applicants are required to fully complete the School's application form which is safer recruitment compliant. Our application form makes clear that all required fields must be completed and if these are left blank the application will not be considered. It also confirms it is an offence to apply for a role that involves regulated activity if you are barred from engaging in regulated activity.

- 5.2 All application forms are carefully scrutinised to identify any gaps in employment, inconsistencies, or contradicting information. Curriculum Vitae (CVs) can be accepted alongside an application form and not in isolation. In these cases, we will always compare the CV against the application form to identify any gaps in employment, inconsistencies, or contradicting information.
- 5.3 If you are shortlisted, any issues of concern, anomalies, discrepancies, or gaps in employment will be explored further at interview. In addition, the reasons for a history of repeated changes of employment without any clear career or salary progression, or a mid career move from a permanent post to supply teaching or temporary work, should also be explored, and verified.
- 5.4 If you need information such as an application form, job specification or person specification in an accessible format (large print, for example), ask us. As long as your request is reasonable, we will agree.
- 5.5 On your application form we will ask you if you have any unspent criminal convictions or cautions. If you do, we will ask you to provide details of these in a sealed envelope marked confidential and we will only look at that information if you are selected for interview. (See Section 13).
- 5.6 If the role is exempt, certain spent convictions and cautions are 'protected' so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.
- 5.7 We will consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.
- 5.8 We won't ask you about your health before making a job offer unless that is necessary and we:
- need to know about any reasonable adjustments that should be made to the recruitment process (that information is kept separate from the application form).
 - need to establish if you would be able to carry out an intrinsic part of the job.
 - need to check if you have a particular disability where that disability is an occupational requirement of the job.
 - are monitoring diversity (see **5.9** below).
 - want to take positive action in respect of disabled people; or
 - have to ask health or disability-related questions because of a legal requirement.
- 5.9 As part of our equal opportunities monitoring, we may ask you to answer questions about yourself, including about your race, physical or mental health, and sexual orientation. Some of this information may be required for monitoring purposes only and to help us to identify any inequalities in our organisation. It's personal information, so we handle it very carefully and we store it separately from application forms. It is not taken into consideration when we are deciding whether to take an application forward in the recruitment process. That includes when we are deciding whether to offer you the job, and the terms of any offer. See 11.1 for further information about how we manage information and make decisions regarding your physical and mental health.
- 5.10 You do not have to give us all or any of the information we collect for equal opportunities monitoring. Whether an applicant does or does not complete a monitoring form has no bearing whatsoever on our recruitment decisions.

6. Shortlisting

- 6.1 Our processes are fair and must be seen to be fair. If an individual involved in the recruitment process has a conflict of interest, they should immediately tell a member of the HR Department/the Business Manager. A conflict of interest could include a relationship or friendship with a job applicant.
- 6.2 Shortlisting will be carried out by more than one person: usually the HR Department and a relevant manager.
- 6.3 We treat all applications confidentially and assess each of them against the job description and the person specification.
- 6.4 We may use one, or any combination, of the following as part of our shortlisting process, with reasonable adjustments for disabled applicants where necessary:
- Selection tests (in-tray exercises or psychometric tests for example)
 - Practical skills such as lesson observations for teaching roles, giving feedback after a lesson observation to a teacher or an Excel test for certain administrative roles
 - Presentation skills assessment
 - Telephone interview
- 6.5 We will contact the successful and unsuccessful applicants as soon as possible after making our decision about who to take forward to interview.
- 6.6 We will not automatically exclude those who have previous criminal convictions without assessing the relevance of any conviction to the vacant job. (See section 13).

7. Interviewing

- 7.1 We encourage pre-interview visits for all posts. If we interview you, we will give you as much notice as possible of the date for your interview.
- 7.2 You should be asked to bring evidence of your eligibility to live and work in the UK to the interview and your photo identification. For teaching roles, we will ask to see evidence of your qualifications.
- 7.3 We will try to accommodate your needs around the timing and format of interview(s) if possible and will make reasonable necessary adjustments for disabled applicants.
- 7.4 Interviews will normally be carried out by a member of SLT, the relevant line manager and/or a member of the HR Department.
- 7.5 Interviews are used to test and measure each applicant's skills, experience, aptitude, suitability, and attitude by reference to the interview criteria that have been set and to rank the applicants according to their suitability for the vacancy.
- 7.6 Interview questions will be based on the job description, person specification, your application form/CV and your selection test results (where relevant). We will ask you specific questions to test and ask you to explain your attitude to safeguarding and promoting the welfare of children. We must be satisfied of your reasons, values, and motivation for wanting to work with children, your ability to form and maintain appropriate relationships and professional boundaries with children, and your emotional resilience.
- 7.7 Our questions will explore and ask you to explain how you manage challenging behaviours, your attitudes to the use of authority and maintaining discipline, any gaps in your job history, concerns

or discrepancies arising from the information provided by you. You will be asked if you have any declarations regarding the requirement for an Enhanced DBS check or the Childcare Disqualification Requirement check. Questions will be as objective as possible, and you will be scored objectively based on your answers.

- 7.8 The reasons for our selection decisions are recorded in writing and kept for at least six months after the vacancy has been filled.
- 7.9 If we do not identify a suitable applicant, we may decide to readvertise the vacancy or a different version of the vacancy.

8. Making a conditional job offer

- 8.1 We will write to the successful applicant with a conditional job offer. This means the offer will be conditional upon the satisfactory completion of all pre-employment checks to include all statutory checks outlined in KCSiE and other statutory guidance. That offer will include details of the terms and conditions of employment - see 8.2 below. We will explain how to accept our offer, including the timescale for that response.
- 8.2 Conditions contained in your job offer include a minimum of two satisfactory references, proof of relevant professional qualifications, and confirmation of your right to live and work in the UK. (See Sections 9 and 11). We may also decide to make an offer conditional on a satisfactory medical examination and/or the results of any other specific checks that it is reasonable, necessary, and proportionate for us to carry out.
- 8.3 When it comes to seeking references, we will decide who we wish to contact for a reference, although we will only contact them with your consent. (See Section 11).
- 8.4 The offer will be withdrawn, or your employment terminated if any material discrepancy or dishonesty on your behalf during the recruitment process is subsequently discovered or if the result of any pre-employment check indicates that you are not suitable for the vacancy or you are unsuitable to work with children.

9. Pre-employment vetting checklist

- 9.1 Decisions about the suitability of prospective employees are based on a range of factors, which include multiple pre-employment checks as required by safer recruitment and statutory guidance. All pre-employment checks must be documented and retained on your personnel file.
- 9.2 In all circumstances before you commence work, we must be satisfied that we have properly completed the following pre-employment checks and any offer of employment will be conditional on these being satisfactory:
- We will verify your identity, preferably from current photographic ID and proof of address;
 - We will verify your right to live and work in the UK. If you have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world, you must undergo the same checks as all other staff in the School. We will ensure we have viewed your original ID documents prior to submitting the application request for a DBS check. We will also carry out further additional checks, as appropriate. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)

For teaching positions: obtaining a letter from the professional regulating authority in the country where you have worked, confirming that they have not imposed any sanctions or restrictions on you, and/or are aware of any reason why you may be unsuitable to

teach, and; record the date on which each vetting / pre-employment check was completed, or the certificate was obtained; and the designated person should sign their name against each check made to affirm the checks have been verified; and record the name of the person who carried out the checks.

- Where any relevant information is not available for overseas applicants we will seek alternative methods of checking their suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.
- We will carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

For all staff, including teaching positions: [criminal records checks for overseas applicants](#)

For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person and/or are aware of any reason why that person may be unsuitable to teach.

- We will check professional qualifications as appropriate and verify the same with the relevant awarding bodies;
- We will obtain an Enhanced DBS check (with barred lists information if you will be engaging in Regulated Activity). We will ensure this check is completed prior to your start date or as soon as practicable after your appointment, including when we use the DBS update service and check it is satisfactory.
- We will obtain a separate barred lists check if you are due to start work in Regulated Activity before the DBS certificate is available. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- We will verify your mental and physical fitness to carry out your work responsibilities. Note that we can ask questions about your health after an offer of employment has been made to you;
- If you are a teacher or if it is relevant to do so, we will ensure you are not subject to a prohibition order;
- If you are employed to carry out teaching work we will ensure you are not subject to any sanction or restriction imposed (that remains current) by the GTCE before its abolition in 2012;
- Where relevant, we will complete a Secretary of State Section 128 Direction check;
- Where relevant, we will ensure you have satisfactorily completed the statutory induction period before your appointment is confirmed;
- We will ensure that appropriate checks are carried out to ensure that you are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

10. Processing pre-employment vetting checks

- 10.1 Where there are any issues of concern or any checks are unsatisfactory, incomplete or there are any inconsistencies in the information provided, they will be followed up and properly resolved before any appointment is confirmed and before you begin your employment at the School.

- 10.2 The Business Manager must be informed about all unsatisfactory checks without delay and kept updated.
- 10.3 An accurate record of the relevant checks will be held centrally on the School's Single Central Record. Where appropriate, copies of these checks will be retained on your personnel file.
- 10.4 Relevant DBS guidance will be followed if a Disclosure reveals relevant information that you have not disclosed in the course of the selection process, which you had a duty to disclose. We may also report relevant facts to any relevant regulatory authority if we have a duty to do so.
- 10.5 In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:
- There are concerns about an existing member of staff's suitability to work with children; or
 - An individual moves from a post that is not regulated activity to one that is, or;
 - There has been a break in service of 12 weeks or more.

11. Pre-employment checks - Employment References

- 11.1 A 'Professional Employment Reference' is a document from a Referee who can vouch for an applicant's qualifications, skills, work experience and suitability for a job. Note: where this policy states 'reference' it is always referring to a professional employment reference, unless otherwise stated.
- 11.2 There is no legal requirement for an employer to provide a reference for an employee. However, where we choose to provide a reference we will comply with our duty to take reasonable care over the content and provide honest, factual information.
- 11.3 The reference form should be tailored to suit each individual job role and adapted as necessary and used as the basis for reference requests. The appropriate Job Description and Person Specification for the vacancy should be included with all reference requests.
- 11.4 Person Specifications will be tailored to suit each individual job role to enable the Referee to provide meaningful information regarding the applicant's ability meet the requirements of the Job Description.
- 11.5 References should be taken up prior to interview where possible. They must always be scrutinised in accordance with safer recruitment practices to ensure we are satisfied that all information provided is fully complete and consistent. However, employment references should not hold up the recruitment and selection process.
- 11.6 Where there are inconsistencies, vague responses or unanswered questions these should be explored with the referee by telephone or in writing to confirm the accuracy of the reference and to explore any concerns.
- 11.7 In all cases a written record of any telephone or written conversation will be kept and if the issues are significant, we will confirm our understanding in writing to the referee. This is particularly important if the information leads us to explore the issues with the you and or we decide not to progress your application or withdraw an offer of employment.
- 11.8 References are sought to obtain objective and factual information to support appointment decisions, to test your suitability to work with children and test the accuracy and truthfulness of the information provided by you on your application form.
- 11.9 To comply with safer recruitment rules reference requests will be addressed to an applicant's current employer, or a previous employer where you worked with children, and ascertain:

- a. Whether or not the Referee is completely satisfied that you are suitable to work with children, and, if you are not, ask for specific details of the referee's concerns and the reasons why the referee believes you might be unsuitable.
 - b. Confirmation of your ability to maintain appropriate professional boundaries between you and children and all adults in the workplace.
 - c. Comprehensive details of any substantiated allegations or concerns regarding you that relate to your behaviour towards children.
 - d. Comprehensive details of any disciplinary action you have been subjected to that relates to your behaviour involving towards children including any sanctions that have expired.
 - e. Comprehensive details of any informal or formal disciplinary action or capability procedures that you have been subject to in the past 2 years; and
 - f. The reason/s why you left your employment with the Referee's organisation.
- 11.10 Any information provided about past disciplinary action or allegations or capability proceedings must be considered and risk assessed carefully and recorded in writing when assessing your suitability for the post. Advice should be sought from the School's HR Provider.
 - 11.11 Very careful consideration will be given to any request by you to delay seeking references prior to interview or at all. Such requests should only be agreed in exceptional circumstances.
 - 11.12 Where you do not give permission for a reference to be obtained prior to interview, we may interview you then seek the reference afterwards. The same level of scrutiny will be required, and it will be necessary to speak to you again if there are any discrepancies or areas of concern.
 - 11.13 When responding to a request for a reference in respect of an employee who has been the subject of a safeguarding allegation, we will not include any details of concerns or allegations that have been found to be False, Malicious or Unsubstantiated in any reference.
 - 11.14 All job offers will be made subject to a minimum of two satisfactory written references (including internal applicants) unless the following applies, or where paragraph 11.15 applies. Where we can only obtain one written reference, clear records will be kept explaining the steps we have taken to obtain two or more written references.
 - 11.15 One written reference must be obtained from your current or last employer, unless the application form discloses special circumstances that justify departure from this rule. An example of special circumstances might be where you have had an extended career break and it can be proved that your last employer has ceased trading and cannot be reached.
 - 11.16 Where it proves difficult to obtain a reference from the referees provided, we may investigate this further with you or seek confirmation of dates of employment from another external source, such as HMRC.
 - 11.17 Where your work does not currently involve working with children, but you have worked with children in the past, whether on a paid or unpaid basis, with your permission, an additional reference must be obtained from the employer where you most recently worked with children. This may mean obtaining an extra reference where you are not currently employed with children.
 - 11.18 As a minimum, references for internal applicants who are existing permanent employees will be sourced via email from a relevant manager/s.

- 11.19 If you are recruited permanently following a successful 'temp to perm' assignment we must receive one reference from the relevant recruitment agency who introduced you to the School and an email reference from a relevant manager.
- 11.20 We will only accept employment references directly from the referees and not those passed on by you or any other person. Open references (for example addressed "to whom it may concern") or testimonials provided directly by you will not be relied upon.
- 11.21 We will take steps to ensure that the information provided on your application form, the interview notes and where applicable, any relevant test results are entirely consistent with the details confirmed in the employment references.
- 11.22 Reference requests should not ask for information about your health or attendance until after a job offer has been made.
- 11.23 We are normally prepared to provide employment references for former employees. For data protection reasons we will only issue an employment reference if we are satisfied that you have provided your willing signed consent for us to do so.
- 11.24 Employment references provided by us will normally only confirm dates of employment, the job title, and salary.
- 11.25 We will check electronic signatures come from a legitimate and reliable source as follows. We will only accept references that contain a signature from the Referee. If an unsigned paper reference is received it will be returned for signature. If an unsigned electronic reference is received, we will ask the referee to verify, sign the reference, scan, and email it to us.
- 11.26 Where a reference is received that contains information that does not support your application, we may withdraw the offer of employment.

12. Personal / Character references

- 12.1 If we are asked to provide or receives a personal/character reference for a current or former work colleague, we will not complete a reference request form. Instead, the reference must:
- Make it expressly clear that the relationship between both parties is personal.
 - Confirm that it is a personal reference.
 - Confirm that we are not acting on behalf of the School.
 - Be issued on plain paper and provide the Employee's personal contact details.
 - Not be issued on official school letter headed paper.

13. Starting in the new job

- 13.1 We aim to introduce you to your new role as smoothly as possible. Our HR Department and your line manager will give you all the necessary information and guidance for that to happen.
- 13.2 You will usually have to complete a probationary period of 6 school working months. It's to make sure that you and we are happy for the employment to continue.

14. How we consider applications from applicants with criminal records

- 14.1 As outlined in our Equal Opportunities/Objectives Policy we actively promote equality of opportunity for all applicants, including those with criminal records where appropriate.

- 14.2 We require you to provide details of any relevant criminal record at an early stage in the application process. Specific rules about which convictions and spent convictions you should disclose and those you need not disclose - known as "protected convictions" - are contained in legislation.
- 14.3 You are required to disclose all convictions, cautions, reprimands, or final warnings that are not 'protected' as defined by the Rehabilitation of Offenders Act and subsequent amendments. All driving convictions must be disclosed if they are relevant to the job you have applied for.
- 14.4 Any such information should be sent in a separate confidential letter to the designated person. Only those who need to see it as a formal part of the recruitment process will have access to this information if you are shortlisted.
- 14.5 If you have a conviction and the nature of the offence is relevant to the vacancy we will review the relevant circumstances of the case and where we consider it necessary to do so, we will exclude you from the selection process.
- 14.6 Having a criminal record will not necessarily prevent you from being appointed.
- 14.7 We are committed to ensuring that all information provided about an applicant's criminal convictions, including any information released in disclosures, is kept confidential.
- 14.8 Information relating to offences will be kept securely in lockable filing cabinets, and access to keys restricted to those responsible for recruitment and HR.
- 14.9 Any recruitment decision will depend on the nature of the position and the circumstances and background of the offence(s). We will discuss with you the relevance of any offence to the job in question.
- 14.10 If you fail to reveal any information relating to disclosures in accordance with our Privacy Notice for Job Applicants, we may withdraw the offer of employment.
- 14.11 Our policy in relation to the handling of criminal records data is contained in our Data Protection Policy.

15. Trainee/student teachers

- 15.1 Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.
- 15.2 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.
- 15.3 Section 15 applies for all student/trainee teachers.

16. Childcare Disqualification

- 16.1 For Employees who work in childcare provision or who are directly concerned with the management of such provision, we will ensure that appropriate checks are carried out to ensure you are not disqualified under the Childcare (Disqualification) Regulations. Where we take a decision that you fall outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on your personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

- 16.2 For 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 Childcare Disqualification Regulations and relevant legislation.
- 16.3 If a disqualifying criterion applies to you, you may be disqualified from working in Relevant Childcare.
- 16.4 We will ask you to complete a declaration form so we can establish whether you are disqualified from working with children. It is your duty to tell us if your situation changes and we will check regularly that all employees, workers, and volunteers remain eligible to work with early years children.

17. Prohibitions, Directions, Sanctions and Restrictions

- 17.1 We will carry out a pre-employment check for any Teacher prohibition order to include an interim prohibition order, a section 128 direction, historic GTCE sanctions and restrictions and European Economic Area regulating authority teacher sanctions or restrictions (where notified to the Teaching Regulations Agency) using the Teachers Services System.
- 17.2 If we discover you are prohibited from working from children as a consequence of these checks the offer of employment will be withdrawn.

18. Agency and Third Party Staff

- 18.1 Prior to the worker's start date, we will obtain written assurance from the agency or third party organisation that it has carried out all necessary pre employment checks via safer recruitment practices, on the worker who is to be supplied, that we would otherwise perform.
- 18.2 We will ensure the written assurance confirms the DBS certificate has either been obtained by the agency who supplied the temporary worker or another accredited business. We will also obtain a copy of the DBS certificate from the agency where the certificate has been obtained before you are due to begin work at the School.
- 18.3 Where a temporary worker is provided by an agency we will verify their identity to ensure the person who presents themselves for work is the same person on whom the checks have been made. Proof of identity will include photographic evidence and the correct birth certificate, driving licence or passport combined with evidence of the person's address.
- 18.4 If an agency worker is later employed by us directly we will complete all pre-employment checks as usual.

19. Volunteers and Governors

- 19.1 We will adopt the same recruitment pre employment checks as we would do for paid staff where it is appropriate to do so and require a prospective volunteer to fully complete an application form.
- 19.2 We will:
- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
 - Obtain an enhanced DBS check with barred list information for all volunteers who are new to working 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.

- 19.3 If you are not engaging in Regulated Activity but you may come into contact with children on a regular basis, e.g., supervised volunteers we will carry out appropriate DBS checks. We are not legally permitted to request barred list information on a volunteer who is not in regulated activity.
- 19.4 All governors are required to have an Enhanced DBS certificate without barred list information unless they work in regulated activity in which case the barred list check will be completed. We will apply for an enhanced DBS certificate within 21 days of the governor's appointment. Governors will also have a section 128 check – see Section 17.

20. Contractors

- 20.1 We make sure that all contractors, or any employee of the contractor working at the organisation have had the appropriate level of DBS check if any such check is required.
- 20.2 Where contractors are recruited by and work for another organisation, e.g., catering or cleaning workers, we obtain written assurance from the employing organisation that the contractor/s have been properly vetted and appointed via the safer recruitment practices.
- 20.3 We will obtain the DBS check for self-employed contractors.
- 20.4 We will not keep copies of such checks for more than 6 months.
- 20.5 Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- 20.6 We always check the identity of contractors and their staff on arrival our premises.

21. Data Protection

- 21.1 During the recruitment process we will need to collect, handle and store various data about you. This is likely to come from different sources including:
- your application form and covering letter.
 - your assessments.
 - notes of your interview.
 - employer references.
 - results of pre-employment checks.
- 21.2 We will only collect data that is relevant to the recruitment decisions we need to make.
- 21.3 We will only take up references on you with your consent, and if that consent is not provided the job offer will be withdrawn.
- 21.4 Relevant data will be held confidentially, stored securely and retained for only as long as necessary, in line with our Data Protection and GDPR Policies.
- 21.5 Only information that has a bearing on the employment relationship will be transferred to your personnel file.
- 21.6 External unsuccessful applicants may be asked if they wish us to retain their personal details on file for consideration against future vacancies.

22. Enforcing this policy

- 22.1 If you are an employee of ours and believe that you have been discriminated against in breach of this policy, you should speak with the Business Manager. If you wish to take the formal step of raising a grievance you should follow our Grievance Policy.
- 22.2 If you make a complaint under this policy in bad faith (where, for example, you know the allegation you are making is not true), we may regard that as a disciplinary issue. In serious situations, that could lead to dismissal without notice or payment in lieu of notice.
- 22.3 If you are found to have breached this policy by unlawfully discriminating against someone during the recruitment process, we may consider that to be misconduct. We might deal with it by providing (additional) training, issuing a warning or, in serious cases, considering dismissal.