

# Recruitment, Selection and Disclosure Policy and Procedure

#### Introduction

Kirkstone House School is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare and education of young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff. The School recognises that in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.

The aims of the School's Recruitment Policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;
- to ensure compliance with all relevant legislation, recommendations and guidance published by the Department for Education Keeping Children Safe in Education (September 2025), Disqualification Under the Childcare Act 2006 (DfE August 2018), Revised Prevent Duty for England and Wales updated April 2019 and any guidance or code of practice published by the Disclosure and Barring Service; and
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

#### **Data Protection**

The School is legally required to carry out the pre-appointment checks detailed in this procedure. Staff and prospective staff will be required to provide information so that checks can be made that are applicable to their role. The School will also be required to provide certain information to third parties such as the Disclosure and Barring Service and the Teacher Regulation Agency. Failure to provide requested information may result in the School not being able to meet its employment, safeguarding or legal obligations. The School will process personal information in accordance with its Staff Privacy Notice.

#### **Recruitment and Selection Process**

All applicants for employment will be required to complete an application form containing questions about their academic and employment history and their suitability for the role.

Applicants will also be asked to provide details of their online profile, including account names and social media handles so the online searches can be carried out on short listed candidates. This information must be provided by the applicant in order for the application to be accepted.

Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not been passed. Should there be any gaps in academic or employment



history, a satisfactory explanation must be provided. A curriculum vitae will not be accepted in place of the completed application form.

Applicants will receive a job description and person specification for the role applied for. Application forms, job descriptions, person specifications and the School's Safeguarding and Child Protection Policy will be sent to applicants by post.

The applicant may then be invited to attend a formal interview at which his /her relevant skills and experience will be discussed in more detail. All short-listed applicants will be tested at interview about their suitability to work with children and young people.

If it is decided to make an offer of employment, following the formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment;
- verification of the applicant's identity (where that has not previously been verified);
- verification of qualifications, whether professional or otherwise; which the School takes into account in making the employment decision, or which are referred to in the application form, whether a requirement for the role or not;
- verification of the applicant's employment history;
- the school being satisfied that any online searches does not make the applicant unsuitable to work in school;
- the receipt of two references (one of which must be from the applicant's most recent employer) which the School considers to be satisfactory;
- 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 Teacher Regulation Agency which renders them unable or unsuitable to work at the School;
- where the position amounts to 'regulated activity' the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory;
- 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 or unsuitable to
  work at the School;
- where the position amounts to 'regulated activity' confirmation that the applicant is not named on the Children's Barred List;
- 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;
- for management positions information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008, which renders them unable or unsuitable to work at the School:
- confirmation that the applicant is not disqualified from working in connection with Early or Later Years' provision if applicable;
- verification of the applicant's medical fitness for the role;
- verification of the applicant's right to work in the UK; and
- any further checks that the School decides are necessary as a result of the applicant having lived or worked outside the UK which may include an overseas criminal records check, certificate of good conduct or professional references.



The School is not permitted to check the Children's Barred List unless an individual will be engaging in 'regulated activity'. The School is required to carry out an enhanced DBS check for all staff who will be engaging in regulated activity. However, the School can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to 'regulated activity' must therefore be considered by the School in order to decide which checks are appropriate. It is however likely that in nearly all cases the School will be able to carry out an enhanced DBS check and a Children's Barred List check.

## **Artificial Intelligence**

The school does not use artificial intelligence software as a decision-making tool at any stage of the recruitment process including in respect of external and internal applications.

### **Pre-employment Checks**

In accordance with KCSIE, DUCA and the requirements of the Education (Independent School Standards) Regulations 2014, the School carries out a number of pre-employment checks in respect of all prospective employees.

In addition to the checks set out below, the School reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. This may include internet and social media searches.

In fulfilling its obligations, the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability pregnancy or age. Please see our Inclusion, Equality and Diversity policy.

#### Online searches

In addition to the checks set out below, the School reserves the right to obtain such formal or informal background information about the applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. In accordance with paragraph 226 of KCSIE this will include online searches on shortlisted candidates. The online searches the School carries out may include searches of internet search engines, websites and social media platforms. Shortlisted applicants will be asked to provide their online profile including account names and social media handles, professional networking site handles and details of websites that the applicant is associated with. This information will be used to carry out online searches. Applicants are not required to provide account passwords or to grant access to private social media or professional networking account content that is not publicly available. However, if information (such as profile pictures and / or account bios) is publicly available when a social media or professional networking site account is locked and can therefore be viewed by the School, it may be taken into account as part of the online search.

On line searches may be carried out at the shortlisting stage or after an offer of employment has been made (but prior to work commencing). The School will not carry out online searches as part of its initial sift of applications.

The School will determine how it approaches searches on a case by case basis. However, all applicants for each particular role at the School will be treated consistently with regard to online searches.



Wherever possible online searches will be undertaken by a person who will play no other part in the recruitment process (including the short- listing exercise) or the appointment decision. In carrying out online searches, the School is looking for any publicly available information about an applicant that:

- May be relevant to their suitability to carry out the role for which they have applied.
- May be relevant to their suitability to work at the School or in an education setting.
- Is of a safeguarding nature; and / or
- May have an impact on the School's reputation.

Any information generated from online searches will be entered in an Online search results record. Where online searches are undertaken on short listed applicants any relevant information generated will be provided to the interview panel for discussion with shortlisted candidates at interview. Where online searches are undertaken on the successful applicant only any relevant information generated will be discussed prior to employment commencing. All offers of employment will be conditional upon the School being satisfied that the successful applicant is suitable to work at the School in light of any information generated from online searches.

In evaluating any online information for relevance, the School will use the following criteria:

- whether the information is relevant to the position applied for;
- whether the information is relevant to the applicant's suitability to work at the School or in an education setting;
- whether the information calls into doubt the applicant's willingness or ability to uphold the School's commitment to safeguarding and promoting the welfare of children;
- the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published;
- whether the information reveals a pattern of concerning behaviour; and
- the relevant circumstances and the explanation/s offered by the applicant.

For the successful candidates, the School will retain information generated through online searches for the duration of the individual's employment and in accordance with its retentions and Records Policy until after employment ends

For unsuccessful candidates the school retains information generated from online searches for 6 months from the date on which they are informed their application was unsuccessful after which it will be securely destroyed.

# Verification of identity, address and qualifications

All applicants who are invited to an interview will be required to bring with them evidence of identity, right to work in the UK, address and qualifications as set out below and in the list of valid identity documents at Appendix 1 (these requirements comply with DBS identity checking guidelines):

- one document from Group 1; and
- two further documents from either of Group 1, Group 2a or Group 2b, one of which must verify the applicant's address; and
- original documents confirming any educational or professional qualifications referred to in their application form.



Where an applicant claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change.

The School asks for the date of birth of all applicants to assist with the vetting of applicants. Proof of date of birth is necessary so that the School may verify the identity and check for any unexplained discrepancies in the employment and education history of all applicants The School does not discriminate on the grounds of age.

# Right to Work in the UK

All applicants must also bring to interview a valid form of evidence which confirms their right to work in the UK. Valid forms of evidence can be found in the Home Office 'Right to Work Checklist' and in some cases, the evidence of your right to work in the UK can also be used as evidence of your identity and address for DBS checking purposes.

The school will check evidence of your right to work in the UK in accordance with the Home Office 'Code of Practice on Preventing Illegal Working': Civil Penalty Scheme for Employees: April 2022.

#### Qualifications

All applicants must also bring to interview original documents which evidence any educational and professional qualifications referred to in their application form and / or which the school requests.

#### **Retention of Records**

The school will retain copies of the documents used to verify the candidate's identity, right to work and qualifications in accordance with the Records Retention Schedule.

### References

References will usually be taken up on short listed applicants before interview. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made. Applicants will be informed that references may be taken up before interview and they are given the opportunity to inform the Bursar's Office if they do not wish for a referee to be contacted at this stage.

All offers of employment will be subject to the receipt of a minimum of 2 references which are considered to be satisfactory by the School. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend.

All referees will be asked whether they believe that the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked whether the applicant is involved in 'extremism'. Referees will be sent a copy of the job description and person specification for the role for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title / duties, reason for leaving, performance, sickness and disciplinary record;
- whether the applicant has ever been subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has



expired), except where the issues were deemed to have resulted from allegations which were found to be false, unsubstantiated or malicious;

- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children and young people, except where the allegation or concerns were found to be false, unsubstantiated or malicious;
- whether the applicant could be considered to be involved in 'extremism'.

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials.

The School 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.

Where a reference is not received prior to interview, it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and / or the interview assessment form will be considered by the School. The applicant may be asked to provide further information or clarification before an appointment can be confirmed.

The School may at its discretion make telephone contact with the referees to verify details in the written reference provided.

All internal candidates who apply for a contractual change of role at the School will have their application assessed in accordance with this procedure. References will be taken up on all internal candidates, where relevant, as part of the application process but can be provided by colleagues as the School will be the most recent employer.

### **Criminal Records Checks**

Prior to May 2013 an enhanced disclosure contained details of all convictions on record (including those which are defined as 'spent' under the rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the National Police 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

Since 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 DBS and the Home Office have developed a set of filtering rules relating to spent convictions which work as follows:

### For those aged 18 or over at the time of the offence

An adult conviction for an offence committed in the UK will be removed from a DBS disclosure if:

- eleven years have elapsed since the date of the conviction;
- it was not imposed for a specified offence;
- it did not result in a custodial sentence.

It will not be removed under any circumstances if it appears on a list of 'specified offences' which must always be disclosed. If a person has more than one offence on their criminal record, then details of all their convictions will always be included.



A spent caution when a person aged 18 or over for an offence committed in the UK will not be disclosed if 6 years have elapsed since the date it was issued, if it does not appear on the list of specified offences and it was not imposed for a specific offence.

## For those aged under 18 at the time of the offence:

A spent conviction for an offence committed in the UK will be removed from a DBS disclosure if:

- five and a half years have elapsed since the date of the conviction;
- it was not imposed for a specified offence;
- it did not result in a custodial sentence.

Again, the conviction will not be removed under any circumstances if it appears on the list of 'specified offences', or if a person has more than one offence on their criminal record.

A caution received when a person was aged under 18 for an offence committed in the UK will not be disclosed if 2 years have elapsed since the date it was issued and if it does not appear on the list of 'specified offences'.

## The List of Specified Offences

This contains a large number of offences which includes certain sexual, violent, and other offences that are considered so serious that they will always be disclosed, regardless of when they took place or of the person's previous or subsequent criminal record. The list of 'specified offences' can be found at:

https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check

# **Regulated Activity**

The School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the School which amount to 'regulated activity' as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of the School will amount to 'regulated activity' if it is carried out:

- · frequently, meaning once a week or more; or
- overnight, meaning between 2.00am and 6.00am; or
- satisfies the 'period condition', meaning four times or more in a 30-day period; and
- provides the opportunity for contact with children.

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.

It is for the School to decide whether a role amounts to 'regulated activity' taking into account all the relevant circumstances. However nearly all posts at the School amount to regulated activity. Limited exceptions could include an administrative post undertaken on a temporary basis in the School Office outside of term time or voluntary posts which are supervised.

## The DBS Disclosure Certificate



The DBS issues the DBS disclosure certificate to the subject of the check only rather than to the school. It is a condition of employment with the School that the original disclosure certificate is provided to the School within 2 weeks of it being received by the applicant. Original certificates should not be sent by post. A convenient time for bringing the certificate into School is arranged through the Bursar's Office so that it can be viewed as soon as it has been received. Applicants who are unable to attend at the School are required to send in a certified copy by post or e-mail within 2 weeks of the original certificate being received. Certified copies must be sent to the Bursar's Office. Where a certified copy is sent, the original disclosure certificate must still be provided prior to or on the first day of work.

Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School.

### Starting work pending receipt of DBS Disclosure

If there is a delay in receiving DBS disclosure the Head has discretion to allow an individual to begin work pending receipt of the disclosure certificate. The School will take into account the 'DBS unusual addresses guide' in such circumstances.

The School takes into account the guidance issued by the NSPCC when deciding whether to request overseas information from applicants, which recommends that such information should be sought on those who have lived overseas for periods of 3 months or more in the last 5 years. However, the School recognises that Education (Independent School Standards) Regulations 2014 do not specify that a minimum period of overseas residence is required. The School therefore assesses each applicant's situation on its individual facts.

Where applicants are asked to provide further overseas information, this will include a criminal records check from the relevant jurisdiction or a certificate of good conduct (as appropriate) and / or references from any employment held.

Work can only commence once sufficient overseas information has been received and only if the School has considered that information and confirmed that the applicant is suitable to work at the School.

## **Prohibition from Teaching Check**

The School is required to check whether staff who carry out teaching work are prohibited from doing so. The School uses the Teaching Regulation Agency Teacher Services system to check whether successful applicants are the subject of a prohibition or interim prohibition order issued by a professional conduct panel on behalf of the Teacher Regulation Agency.

In addition, the School asks all applicants for roles involving teaching work (and their referees) to declare in the application form whether they have ever been referred to or are the subject of a sanction, restriction or prohibition issued by the Teaching regulation Agency or other equivalent body in the UK.

It is the School's position that this information must be provided in order to fully assess the suitability of an applicant for a role which involves teaching work. Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the Teaching Regulation Agency, (or other equivalent body) whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.



The School carries out his check for roles which involve 'teaching work'. In doing so the School applies the definition of 'teaching work' set out in the teachers' Disciplinary (England) Regulations 2012 which states that the following activities amount to 'teaching work':

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

The above activities do not amount to 'teaching work' if they are supervised by a qualified teacher or other person nominated by the Head. If in any doubt or if the applicant has taught previously, or may teach in the future, the check will be undertaken.

In addition, for all appointments made on or after 18<sup>th</sup> January 2016, where an applicant has carried out teaching work outside of the UK, the School will ask the applicant (and their referees) whether they are subject of a sanction issued by a regulator of the teaching profession in the countries in which they have carried out their teaching work. This will include checking for the existence of any sanctions issued by regulators of the teaching profession in other EEA countries using the Teaching Regulation Agency Teacher Services system.

## **Prohibition from Management Check**

The School is required to check whether any applicant for a management position is 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.

The School will carry out checks for such directions when appointing applicants into management positions from both outside the School and by internal promotion.

The check applies to any management appointments made on or after 12<sup>th</sup> August 2015.

The relevant information is contained in the enhanced DBS disclosure certificate. It can also be obtained through the Teaching Regulation Agency Teacher Services. The School will use either or both to obtain this information.

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

It is the School's position that in order to fully assess the suitability of an applicant for a management role it must be provided with the above information. Where an applicant is not currently prohibited from management but has been the subject of a referral to, or hearing before the Department for Education or other appropriate body whether that resulted in the imposition of a section 128 direction or other sanction, or where a section 128 direction or other sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.

### **Childcare Disqualification**

The Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 state that it is an offence for the School to employ anyone in connection with Early Years provision (EYP) or later years'



provision (LYP) who is disqualified, or for a disqualified person to be directly involved in the management of the EYP or LYP.

#### **Definitions**

EYP includes usual school activities and any other supervised activity for a child up to 1 September after the child's 5<sup>th</sup> birthday which takes place on the school premises during or outside of the normal school day.

LYP includes provision for children not in EYP and under the age of 8 which takes place on school premises outside of the normal school day, including for example breakfast clubs and after school provision.

DUCA states that only those individuals who are employed directly to provide childcare are covered by the regulations. 'Childcare' means any form of care for a child which includes education and any other supervised activity for a child who is aged 5 or under. Childcare in LYP does not include education during school hours but does cover before and after school clubs.

#### **Relevant Roles**

Roles which will be covered by the Regulations are teaching and teaching assistant positions in the EYP and those which involve the supervision of under 8s in LYP. Those who are directly involved in the management of EYP and LYP include the Head and the Senior Teacher in Lower School.

DUCA contains an express statement that cleaners, drivers, catering and office staff are not covered by the Regulations.

Some roles at the School may involve the provision of childcare in EYP or LYP on an occasional basis. They will not automatically be within the scope of the Regulations and the School will therefore consider whether they do on a case by case basis. The Regulations only apply to a limited number of roles within the School but do extend to volunteers who carry out relevant work.

### **Grounds for Disqualification**

The grounds on which a person will be disqualified from working in connection with EYP or LYP are set out in the Regulations. They are not only that a person is barred from working with children (by inclusion on the Children's Barred List) but also include:

- having been cautioned (after April 6<sup>th</sup> 2007) for, or convicted of, certain criminal offences including violent or sexual criminal offences against children and adults whether committed in the UK or overseas:
- various grounds relating to the care of children, including where an order is made in respect of a child under a person's care;
- having been refused registration for the provision of childcare (including nurseries, day care and child minding or other childcare), having been disqualified from any such registration or having had that registration cancelled;
- having been refused an application for registration of a children's home or having had any such registration cancelled; or
- having been prohibited, restricted or disqualified from private fostering.



#### **Self-Declaration Form**

All applicants to whom an offer of employment is made to carry out a relevant role in EYP or LYP will be required to complete a Self-Declaration Form confirming whether they meet criteria for disqualification under the Regulations.

The School will decide whether a role is relevant and within the scope of EYP or LYP by having regard to guidance from DUCA. Employment in the School in any relevant role will be conditional upon completion of the Self-Declaration Form and upon the applicant not being disqualified.

The School cannot permit any person who is currently disqualified to start work in a relevant role. The School also reserves the right at its absolute discretion to withdraw any offer of employment if, in the opinion of the School any information disclosed in the Self-Declaration Form renders that person unsuitable to work at the School.

Applicants who have any criminal records information to disclose about themselves must also provide the following information:

- details of the order, restriction, conviction or caution and the date that this was made;
- the relevant court or body and the sentence, if any, which was imposed, and
- a copy of the relevant order or conviction.

Applicants are not required to disclose a caution or conviction for an offence committed in the UK if it has been filtered in accordance with the DBS filtering rules.

For the avoidance of doubt, the School does not require applicants to request any criminal records information directly from the DBS, The School only requires applicants to provide relevant information about themselves 'to the best of their knowledge'.

## Retention of disqualification information

The School will securely destroy any information which is provided by an applicant which is not relevant to the childcare disqualification requirements as soon as it is established that it is not relevant. Where a person appointed to the School is found to be disqualified the School will retain any relevant information only for the period it takes for a waiver application to be heard and the decision communicated to the School, after which it will be securely destroyed.

## Continuing duty to disclose change of circumstances

After making this declaration, staff in a relevant role are under an on-going duty to inform the School if their circumstances change in a way which would mean that they subsequently meet any of the criteria for disqualification. Any failure to disclose relevant information now, or in a future change in circumstances, will be treated as a serious disciplinary matter and may lead to the withdrawal of a job offer or dismissal for gross misconduct.

#### **Medical Fitness**

The School is legally required to verify the medical fitness of anyone to be appointed to a post at the School **after** an offer of employment has been made but **before** the appointment can be confirmed.

It is the School's practice that all applicants to whom an offer of employment has been made must complete a Health Questionnaire. The School will arrange for the information in the questionnaire to be reviewed in the first instance by the Bursar's Office. This information will be reviewed against the job description and person specification for the particular role together with any other physical or



mental requirements of the role, e.g. extra-curricular activities, layout of the School. If the Bursar's Office has any doubts about an applicant's fitness, the School will consider reasonable adjustments in consultation with the applicant. The School may also seek a further medical opinion from an Occupational Health specialist or request that the applicant undertakes a full medical assessment.

The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence, considering reasonable adjustments and suitable alternative employment.

## **Contractors and agency staff**

If the School uses contractors undertaking regulatory activity at the School, it will complete the same checks as for its own employees. The School requires written confirmation from the contractor that it has completed these checks on all individuals whom it intends will work at the School before any such individual can commence work.

Agencies who supply staff to the School must also complete the pre-employment checks which the School would otherwise complete for its staff. Again, the School requires confirmation that these checks have been completed before an individual can commence work at the School.

The School will independently verify the identity of individuals supplied by contractors or an agency in accordance with staff procedures and the provision of a DBS disclosure certificate is required before those individuals can commence work at the School.

#### **Volunteers**

The School will request an enhanced DBS disclosure and Children's Barred List Information on all volunteers undertaking regulated activity with pupils at or on behalf of the School.

The School considers most volunteers to be undertaking regulated activity, however the School will request an enhanced DBS check without Children's Barred List information on all volunteers who do not undertake regulated activity. This is likely to be because their volunteering duties are subject to regular day to day supervision by a fully checked member of staff or volunteer who the School has deemed appropriate to supervise and ensure the safety of children within their care.

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

It is the School's policy to regularly check that volunteers who will engage in regulated in activities with the activity continue to be engaged in activities with the School and to risk assess whether a new DBS check is required for any volunteers who are not involved in activities in school for a period of time. Volunteers may be asked to sign up to the DBS update service.

In addition, the School will seek to obtain further suitability information about a new volunteer. This may include (but is not limited to the following):

- checking within the School community for any concerns regarding the volunteer;
- character references from the volunteer's place of work or any other relevant source, and
- an informal safer recruitment interview and child protection induction,
- confirmation that the volunteer is not disqualified from working in connection with Early Years or Later Years provision if relevant.



# **Visiting Speakers and Prevent Duty**

The School has a Visitors and Visiting Speakers' Policy which describes the safer recruitment checks applicable to visitors including contractors.

# 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 appointment decisions 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 merits in accordance with the objective assessment criteria set out below:

All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered 'spent' except those received for an offence in the UK if it has been filtered in accordance with the DBS filtering rules.

A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also account to a criminal offence.

It is unlawful for the School to employ anyone who is barred from working with children. It is a criminal offence for any person barred from working with children to apply for a position at the School. The School will make a report to the Police and / or the DBS if:

- it receives an application from a barred person;
- it is provided with false information in, or in support of an applicant's application; or
- it has serious concerns about an applicant's suitability to work with children.

#### **Assessment Criteria**

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter 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 and other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the applicant.

If the post involves regular contact with children, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of the following offences:

- Murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; and
- Serious class A drug related offences, robbery, burglary, theft deception or fraud.



If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last 10 years.

#### **Assessment Procedure**

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Bursar's Office or the Headteacher before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for disputed information, the School may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

### Retention and security of disclosure information

The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

### **Whistle Blowing**

All staff are trained so that they understand they are expected and encouraged to raise concerns they have whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the School's policies (including Whistle Blowing, Safeguarding and Child Protection Policy and the Staff Code of Conduct). Safeguarding is at the centre of the School's culture and concerns should always be raised in accordance with the School's Safeguarding and Child Protection Policy. If issues have not been identified before, safeguarding will always be considered formally if raised during staff continuing professional development reviews.

## Referrals to the DBS and Teaching Regulation Agency

This policy is primarily concerned with the promotion of safer recruitment and details the preemployment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks, the School also has a legal duty to make a referral to the DBS in circumstances where an individual:

- Has applied for a position at the School despite being barred from working with children; or
- Has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm, to a child.

If the individual referred to the DBS is a teacher, the School may also decide to make a referral to the Teaching Regulation Agency.



### **Queries**

If any applicant has any queries on how to complete the application form or any other matter, they should contact the School's main office and ask to speak to the Bursar's Department.

## **Review of Policy**

Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities and that the selection criteria are justified on non-discriminatory grounds as being essential for the effective performance of the job. The School will adopt recruitment methods aimed to reach suitably qualified or skilled individuals from all sectors of the community.

Authorised by

Corvine Harel.

Mrs. C L Jones Headteacher

On behalf of the Proprietors

Dated September 2025

Date of next review September 2026



# Appendix 1

## **List of Valid Identity Documents**

### **Group 1: Primary documents**

- Current passport
- Biometric residence permit (UK)
- Current driving licence (photocard full or provisional (UK / Isle of Man / Channel Islands and EEA)
- Birth certificate issued within 12 months of birth (UK / Isle of Man and Channel Islands –
  including those issued by 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 EEA; full or provisional)
- Current driving licence (paper version; UK / Isle of Man / Channel Islands and EEA; full or provisional
- Birth certificate issued after time of birth (UK, Isle of man and Channel Islands)
- 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 EEA country in which the role is based.
- HM Forces ID card (UK)
- Fire arms licence (UK, Channels and Isle of Man)

## All driving licences must be valid.

### **Group 2b: Financial and social history documents**

- Mortgage statement (UK or EEA)\*\*
- Bank / building society statement (UK and Channel Islands or EEA)\*
- Bank / building society statement (countries outside the EEA)\*
- Bank / building society account opening confirmation letter (UK)\*
- Credit card statement (UK or EEA)\*
- Financial statement e.g. pension, endowment, ISA (UK)\*\*
- P45 / P60 statement (UK and Channel Islands )\*\*
- Council Tax statement (UK and Channel Islands)\*\*
- Letter of sponsorship from future employment provider (non UK / non EEA only; valid only for applicants residing outside the UK at the time of application; must be valid at time of application.
- Utility bill (UK; not mobile phone bill)\*
- A document from central or local government / government agency / local council giving an entitlement – e.g. from the Department for Work and Pensions, the Employment Service, HM Revenue and Customs, Jobcentre, Jobcentre Plus, Social Security (UK and Channel Islands)\*



- EU National ID card (must be valid at time of application)
- Cards carrying the PASS accreditation logo (UK and Channel Islands; must be valid at time of applications)
- Letter from Head or Principal (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).

## Note

If a document in the list of valid identity documents is:

denoted with \* it should be less than 3 months old

denoted with \*\* it should be less than 12 months old.