



ALDENHAM FOUNDATION

**Recruitment, Selection and Disclosures
Policy and Procedure**

**August 2018
by KM**

Recruitment, Selection and Disclosures Policy and Procedure

The Aldenham Foundation is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

The Foundation aims to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

The prime aim of The Foundation under this Policy is to ensure that the best and most appropriately skilled person is recruited to the right job on terms and conditions of employment which are satisfactory to both parties.

The Foundation has an Equal Opportunities and Dignity at Work Policy (which can be found on the HR Portal or 'T' drive). The requirements of this Policy must be followed in all recruitment of staff.

The Foundation is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

All queries on the Foundation's Application Form and recruitment process must be directed to the HR Manager.

An entry will be made on the Single Central Register for all current members of staff at the Foundation, the proprietorial body and all individuals who work in regular contact with children including governors, volunteers, supply staff and those employed as third parties.

All checks will be made in advance of appointment or as soon as practicable after appointment.

Introduction

The Aldenham Foundation is a "data controller." This policy is to help you understand how and why we collect personal information about you and what we do with that information. It also explains the decisions that you can make about your own information. If you have any questions about this policy, please contact the Bursar in the first instance. It is also aimed at all Foundation staff (including Governors, volunteers and certain contractors) and applicants for employment vacancies. This policy does not form part of your contract of employment and the Foundation may amend this policy at any time.

Data Protection Manager

We have appointed Mr K Mahon, the Bursar as the Foundation's Data Protection Manager (DPM) to oversee compliance with this Policy. If you have any questions about this Policy or how we handle your personal information, please contact the DPM. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.

- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Scope of this Policy

The Recruitment, Selection and Disclosures Policy and Procedure herewith refers and applies to staff directly recruited and employed by the Foundation. In the Education (Independent Schools Standards) (England) Regulations 2014, staff are defined as:

Any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer.

In the case of agency or contract workers, The Foundation shall obtain written confirmation from the agency or company that it has carried out the appropriate checks. The Foundation conducts identity checks on agency and contract workers on arrival in School and, in the case of agency workers which includes supply staff, The Foundation must be provided with a copy of the DBS check for such staff.

The Foundation will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure – renewed every 3 years, right to work in the United Kingdom, barred list/list 99, prohibition, qualifications, overseas checks plus in line with KCSIE two references, declaration of medical fitness, check of previous employment history). The Single Central Register shows these checks have been made and The Foundation carries out its own identity check and has a copy of the disclosure.

In respect of contractors, unchecked contractors will under no circumstances be allowed to work unsupervised in School. The Foundation will determine the appropriate level of supervision depending on the circumstances.

Any staff who TUPE transfer into The Foundation's staff will be required to undertake the statutory requirements with regard to safer recruitment checks.

If staff are transferred under TUPE (gap of three months or less and information complete) information will be passed to the new employer and a note made on the Single Central Register that details have been accepted under TUPE.

The Vacancy

A vacancy may occur through an existing member of staff moving to another position within the Foundation, changing their working hours or leaving the Foundation's employment. It may also occur through the creation of a new post. No recruitment to fill a vacancy, however that vacancy may occur, may take place without the prior agreement of a member of the FLG.

All vacancies for permanent positions (whether full or part time) will be advertised. This means the scope of such advertising will be at the discretion of a member of the FLG, having regard to the requirements of the vacancy and the Foundation's legal obligations.

As a minimum, all permanent internal vacancies must be advertised internally by email. Existing employees must feel able to apply especially if supported by their Line Manager.

When there is a need to employ a member of staff for an internal position which holds additional responsibility, the Headmaster, Principal of the Senior School, Headmistress of Prep School, Headmistress of St Hildas or the Bursar will ask for parties interested to email him/her with their interest and then an internal interview procedure will take place, consisting of a 2 or 3 member panel. The appointment will then be announced by email. Unsuccessful candidates will be informed via email or in person by the Headmaster, Principal of the Senior School, Headmistress of Prep School, Headmistress of St Hildas or the Bursar

All vacancies advertised externally should also appear on The Foundation's websites. Unless agreed otherwise, the Headmasters or Headmistress' PAs for Teaching roles and the HR Manager for Support roles, will be responsible for placing the advertisement. Advertisements must conform to The Foundations Equal Opportunities and Dignity at Work Policy and care should be taken with regard to Age Discrimination legislation.

Before a vacancy is advertised a Job Description and Person Specification will be drawn up setting out the elements of the job, likely required qualifications, skills and other attributes, principal terms and conditions of employment (hours, salary range, other benefits) and any other relevant facts. Application will be by Application Form only (unless the position advertised is for an internal post). Reference will also be made to their suitability to work with children and our commitment to safeguarding and promoting the welfare of children. The requirement for 2 references and a DBS check at Enhanced level must be stated. One referee should be the current or most recent employer, family and friends are excluded as referees. It is also necessary to contact the providers of the references to verify verbally the written reference given.

A copy of the Foundation's Application for Employment Form can be obtained from the HR Manager or the websites.

Advertising

With prior agreement of a member of the FLG, an advertisement in an approved format will be published in appropriate locations and publications. Advertisements should contain a statement regarding the need for the successful candidate to undertake a DBS check. Applicants for this post must be willing to undergo Safeguarding screening, including reference checks with previous employers, Prohibition checks and a criminal record check via the DBS.

Unless otherwise agreed, advertisements will follow a standard format. Consideration should be given to the advertisement containing a short description of the post, any qualifications and person specifications required, details of how to apply, closing date and whom to contact. Where practicable the advertisement should also contain dates for interviews.

The phrasing of the advertisement will not be in any way discriminatory and will provide sufficient details about the vacancy to be likely to attract the interest of all suitable applicants. It will specify how further details may be obtained and a closing date for receipt of applications.

An Applicant Pack must be sent out promptly to all interested parties in a manner requested by each applicant and a record kept. The application pack will contain the following information:-

- Application Form
- Job Description/Person Specification
- Equal Opportunities Form

- Equal Opportunities and Dignity at Work Policy
- Safeguarding Children Policy
- Recruitment of Ex-Offenders Policy
- Useful Information about the relevant School within the Foundation

Application Form

The Foundation will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms.

The Foundation will make candidates aware that all posts in the Foundation involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. Candidates for employed posts will receive a Job Description and Person Specification for the role applied for.

Checks will be made of previous employment history to ascertain satisfactory reasons for any gaps in employment. These checks will then be checked against references and any discrepancies discussed with the candidate.

As the position for which candidates are applying involves substantial opportunity for access to children, it is important that applicants provide the Foundation with legally accurate answers. Upfront disclosure of a criminal record may not debar a candidate from appointment as the Foundation shall consider the nature of the offence, how long ago and at what age it was committed and any other relevant factors. Information should be submitted in confidence enclosing details in a separate sealed envelope which will be seen and then destroyed by the HR Department. If candidates would like to discuss this beforehand, they are asked to please telephone in confidence to the Bursar for advice.

Any unspent convictions, cautions, reprimands or warnings must be disclosed to the Foundation. However, amendments to the Exceptions Order 1975 (2013) provide that certain spent convictions and cautions are 'protected' and are not subject to disclosure to employers, and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found at the DBS website.

The successful applicant will be required to complete a Disclosure Form online from the DBS for the position. Additionally, successful applicants should be aware that they are required to notify The Foundation immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration including 'by association' i.e. they live in the same household (or someone is employed in their household) as someone who has unspent cautions or convictions for a relevant offence.

The 'by association' requirement also applies if you live in the same household as or someone is employed in your household who has been disqualified from working with children under the Childcare Act 2006.

The Disqualification under the Childcare Act 2006 (June 2016) apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 and to those who are directly concerned in the management of that childcare.

The Foundation takes its responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect his/her suitability to work with children must notify their manager immediately. This will include notification of any

convictions, cautions, court orders, reprimands or warnings he/she may receive. He/she must also notify The Foundation immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

Staff and/or successful candidates who are disqualified from childcare or registration, including 'by association', may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Bursar for more details.

Failure to declare any convictions (that are not subject to DBS filtering) may disqualify a candidate for appointment or result in summary dismissal if the discrepancy comes to light subsequently.

The Foundation has a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent duty. Schools are required to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Accordingly, as part of the recruitment process, when an offer is made the offer will be subject to a Prevent duty risk assessment [more guidance for schools from the DfE on this can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf].

If the candidate is currently working with children, on either a paid or voluntary basis, the Foundation will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure.

If the candidate is not currently working with children but has done so in the past, The Foundation will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the Foundation will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the Foundation may request character references which may include references from the candidate's school or university.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the Foundation if they have been appointed, and a possible referral to the police and/or DBS.

Selection Process

The interview and selection panel will, wherever practical, consist of at least 2 persons and include the relevant Line Manager (one person should have been on the Safeguarding Children and Safer Recruitment in Education training). The panel will draw up a matrix of the desired skills, qualifications and other qualities with minimum acceptable scores identified.

All applications received by the published closing date will be scored by the interview panel against these parameters. This process must be non-discriminatory. Candidates whose scores exceed the minimum acceptable benchmark will be considered for interview. If there are any facts affecting an applicant's eligibility which require clarification (i.e., immigration status, qualifications, gaps in employment, and other anomalies) these must be checked at this stage and satisfactorily resolved before the invitations for interviews are sent.

The decision as to the length of the selected interview list will be taken by the relevant Line Manager in consultation with the relevant member of the FLG or the HR Manager and having regard to the relative strength of the field of applicants. Subject to there being a sufficient number of suitably qualified candidates, the interview list will not be less than 3 in the first instance.

Dates and times for interview will be identified and the candidates contacted and interview arranged. If references are to be taken up at this stage, applicants must be advised. Reasonable effort must be made to accommodate any timing difficulties that particular candidates may have and all candidates must be sent the same information by the Foundation relating to the vacancy. Unsuccessful candidates should be advised in writing that their application has not been successful in this instance.

All candidates invited to interview must bring documents 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). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

The Foundation requests that all candidates invited to interview also bring with them:

- A current driving licence including a photograph or a passport or a full 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;
- Where the candidate is not a citizen of a country within the European Economic Area or Switzerland, proof of entitlement to work and reside in the UK.

Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

Candidates with a disability who are invited to interview should inform the School of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

The Interview Process

The interview process must follow the requirements laid down in the Equal Opportunities and Dignity at Work Policy and must be fair for all candidates. Interviewers must be careful not to ask questions of any individuals which could be considered discriminatory. If an applicant suffers from a disability which would require the Foundation to change the envisaged working routine of the job or to make alterations to means of access to its buildings or facilities, these should be fully discussed with the candidate and an assessment carried out under the requirements of the Equality Act 2010. If such changes are reasonably practicable they must be made if that applicant is, in all other respects, the best candidate for the vacancy.

At least one member of the interview panel should have completed the Safer Recruitment training as recommended by current legislation.

For Teachers - References should be sought on all short-listed candidates before interview (including internal applicants and support staff applicants), so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview.

Where references have not been returned prior to interview a follow up interview will be arranged with the applicant to discuss any issues arising.

Written records of interviews must be made, signed and dated by the interviewer and retained. Interviewers must be aware that these may be referred to at a later date and could even be required as evidence. If the application has been by CV the interviewers must ensure that all the questions which appear on the Application Form are covered in the process. Evidence of identity and qualifications should be seen and recorded. Applicants should also be made aware of the timescale involved.

Dependent on the decision taken during the selection process a single favoured candidate may be identified from a single round of interviews or a shortlist for a second interview may be drawn up. If a second round of interviews is required the unsuccessful candidates must again be notified in writing.

When a favoured candidate is identified a job offer will be made subject to satisfactory references, DBS check and proof of immigration status (applies to all new employees including those who are British Citizens). With the agreement of the relevant member of the FLG or HR Manager, a verbal offer may be made by the Line Manager. This must be followed up by a written offer which may only be made by the Head, Heads of Prep Schools or Bursar.

Contact with unsuccessful candidates should, at this stage, be delayed until the appointee has confirmed acceptance in writing.

Conditional Offer of Appointment: Pre-Appointment Checks

Any offer to a successful candidate will be conditional upon:

- Receipt of at least two satisfactory references (if these have not already been received);
- Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK;
- A satisfactory enhanced DBS check and if appropriate, a check of the Barred List maintained by the DBS;
- For a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:
 - Planning and preparing lessons and courses for pupils
 - Delivering and preparing lessons to pupils
 - Assessing the development, progress and attainment of pupils
 - Reporting on the development, progress and attainment of pupils;
- Verification of professional qualifications, where appropriate;
- Verification of successful completion of statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999);
- Where the successful candidate has worked or been resident overseas such checks and confirmations of the School may consider appropriate so that any relevant events that occurred outside the UK can be considered;
- Satisfactory medical fitness;
- EYFS: Confirmation the successful candidate is not disqualified from providing childcare under the Disqualification under the Childcare Act 2006 (June 2016) **OR** Receipt of a signed Staff Suitability Declaration form showing that the candidate is not

disqualified from providing childcare under the Disqualification under the Childcare Act 2006 (June 2016);

- Where the successful candidate will be taking part in the management of the school, a check will be carried out under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Management Team and teaching heads of department; and
- For a candidate that has lived or worked outside the UK, an EEA check using the Teaching Regulation Agency (TRA) system for information about any teacher sanction or restriction.
- It is the Foundation's practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by the Foundation in the strictest confidence and processed in accordance with the Recruitment Privacy Notice and Data Protection Policy. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed workload, extra-curricular activities, lay out of the School.
- The Foundation is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

The Appointment

The Headmaster, Headmistress of the Prep School, Headmistress of St Hildas or the Bursar will issue a written conditional job offer stating the principal terms of the offer (job title, salary, working hours, probationary period, notice, holiday and other entitlements). This will be sent in duplicate and the appointee will formally accept the offer by signing and returning the copy letter to the Bursar with a confirmation of starting date. The letter will be accompanied by the Foundation's ICT Code of Conduct Form for completion and return. The HR Manager will, (if not already established) apply for a health check, disqualification by association (EYFS) and/or Prohibition check for employees carrying out teaching work since April 2012, references and request proof of qualifications (if not already on file).

The appointee will complete the DBS application at Enhanced level online with the HR Manager together with the appropriate backup proofs of identity. In the event that the disclosure contains criminal record information this will be considered by The Foundation in accordance with its policy on Recruitment of Ex-Offenders (which can be found on the HR Portal or 'T' drive) and a decision taken as to whether the conditional offer of employment can be upheld or should be withdrawn. This decision will be notified in writing to the appointee by the Head, Heads of Prep Schools or Bursar. It is The Foundation's decision that the DBS Disclosure will be renewed every ten years.

Where an applicant subscribes to the DBS Update Service the applicant must give consent to the school to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required. A copy of the original DBS disclosure is required.

If disclosure is delayed, a short period of work is allowed under controlled conditions, at the Headmasters discretion. However, if an 'enhanced disclosure' is delayed, the Headmaster may allow the member of staff to commence work:

- Without confirming the appointment;

- After a satisfactory check of the barred list if the person will be working in regulated activity and all other relevant checks (including any appropriate prohibition checks) having been completed satisfactorily;
- Provided that the DBS application has been made in advance;
- With appropriate safeguards taken (for example, loose supervision);
- Safeguards reviewed at least every two weeks by the Head/Bursar and member of staff;
- The person in question is informed what these safeguards are; and
- It is recommended, but not a requirement that a note is added to the single central register and evidence kept of the measures put in place.

Should the DBS not cover offences committed abroad, the Foundation will obtain evidence (ie Police Disclosure) from the member of staff's country of origin, or any other countries in which they may have lived, prior to appointment. The Foundation also takes account of the rules for employing migrant workers. The Human Resources Manager will also check against the EEA Prohibition List.

Copies of proof of identity to satisfy immigration regulations will be retained securely in the individual's personal file kept in the HR Manager's office. A copy of the letter of appointment will be passed to the Payroll Department. Notice of the appointment will be circulated to all relevant staff.

The DBS will issue a Disclosure Certificate directly to the new member of staff. It is a condition of employment with the Foundation that the original disclosure certificate is made available to the Foundation within two weeks of it being received by the applicant. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the Foundation.

Commencement

In normal circumstances all references and the DBS Certificate will be received before the appointee commences employment. There may however be occasional exceptional circumstances where it is desirable for an applicant to take up post before this process is completed. In such circumstances, if written references have not been received, interim verbal references must be obtained before the appointee starts work at the School. If obtaining a verbal reference over the telephone, you must ensure that relevant questions are asked (including safeguarding) and detailed notes made of their reply. These notes should be marked **'This is a true reflection of our conversation'**, and then signed and dated. There are provisions where it is possible to obtain a clearance from the Barred List pending the full check and this check must be obtained from the HR Department before the member of staff is permitted to start work. The Line Manager must then complete a DBS risk assessment (available from the HR Manager) and the appointee must be accompanied by a fully checked member of staff in all situations involving potential contact with children.

New staff must, immediately on starting work at The Foundation, receive basic induction training which will include necessary Health & Safety, Fire Safety, Whistleblowing and Safeguarding information. Formal Safeguarding training from the School's Designated Safeguarding Lead in charge of Safeguarding Children will be arranged as soon as possible thereafter.

All staff must receive a Contract of Employment within 8 weeks of their starting date. This will be issued by the Headmaster or Bursar and will set down the full terms and conditions of employment including Grievance and Disciplinary procedure. At the end of the probationary period a review meeting must be held between the Line Manager and the appointee and

successful completion of this confirmed. If for any reason the probationary period is not proceeding satisfactorily this should be addressed at an earlier stage after consultation with the Headmaster, Headmistress of Prep School, Headmistress of St Hildas, Bursar or HR Manager.

References

The Foundation will seek the references for shortlisted candidates and may approach previous employers for information to verify particular experience or qualifications, before interview. If the candidate does not wish the School to take up references in advance of the interview, they should notify the School at the time of applying.

The School will ask all referees if the candidate is suitable to work with children.

The School will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.

Criminal Records Policy

The Foundation will refer to the Department for Education (“DfE”) document, ‘Keeping Children Safe in Education’ and any amended version in carrying out the necessary required DBS checks.

The Foundation complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request, or accessed here:

<https://www.gov.uk/government/publications/dbs-code-of-practice>.

There are limited circumstances where The Foundation will accept a check from another educational institution which are as follows:

This is where the new member of staff (“M”) has worked in: –

- A school or a maintained school in England in a position which brought M regularly into contact with children or young persons;
- A maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or
- An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons, during a period which ended not more than three months before M’s appointment.

In these circumstances the school may apply for a disclosure but is not required to do so. A new, separate barred list check will be obtained.

Retention, Security of Records and Data Protection Obligations

The Foundation will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.

The Foundation will comply with its data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice and the Data Protection Policy.

The application and interview records for the appointee will be retained in a file kept in the HR Manager's Office. To comply with Data Protection regulations, it is essential that storage is secure and access restricted. All relevant documents relating to the employment must be stored in this one location and supplementary files or personal information should not be kept in other locations.

DBS Disclosure information is retained in accordance with the Foundation's Security Policy for Handling Disclosure Information (which can be found on the HR Portal or 'T' drive).

Application and interview records for unsuccessful applicants will be retained for 6 months from the date of notification of unsuccessful application and then destroyed (unless the Foundation has specifically requested the applicant's agreement to retain the record beyond this time).

PREVENT DUTY

All staff/volunteers/Peripatetics and Governors will be required to undertake the online general awareness training module and provide a certificate on completion.

Staff working with children under 8 years old, will be required to complete a Disqualification by Association form, before commencement, and every year thereafter.

Recruitment of Supply Teachers

When employing Supply Teachers from Employment Agencies the following must be adhered to:-

- 1) Written confirmation is received from the Agency confirming the following:
 - The teacher's identity;
 - Qualifications;
 - Medical Fitness;
 - Previous employment history checked;
 - Barred List/Prohibition List check;
 - Two references have been taken;
 - If the teacher has lived outside the UK for any period of time, further checks have been undertaken;
 - Confirmation that the teacher has a right to work in the UK;
 - They have obtained an Enhanced DBS disclosure within the last 3 months or a DBS disclosure has been obtained within the last 3 months by a school or FE Institution;
 - Any matter or information which has been disclosed in the DBS disclosure in accordance with section 113B(6) of the Police Act 1997.

- 2) The School should carry out their own checks as follows:-
 - the teacher's identity;
 - the Enhanced DBS disclosure has been seen and a copy taken for the School's records;
 - a risk assessment has been completed in the event of any disclosed information on the Enhanced DBS disclosure;
 - A current Safeguarding Certificate or evidence of recent Safeguarding training;
 - Prohibition/Barred List check;
 - If relevant, a Disqualification by Association form completed.

On receiving notification of a vacancy, the Agencies are contacted with details of the post and with a list of our requirements as above. A member of staff trained in 'Safer Recruitment' should assess all candidates CVs and explore their suitability to work with children. Any anomalies/discrepancies/omissions should be followed up with the candidates before confirming appointment with the Agency.

On agreeing to a suitable candidate, the written notification required above, is provided by the agency along with details of the candidate's date of birth, surname, maiden name if applicable or any other surnames used. This will enable a Barred List check to be completed by the HR Manager.

On the first day of teaching the candidate must produce an original copy of their enhance DBS disclosure, proof of identity and a Safeguarding Certificate to the Human Resources Manager before commencement of duties. The candidate will be required to read and sign The Foundation's Safeguarding Children Policy, Keeping Children Safe in Education - Part 1 guidelines and Code of Conduct.

The Supply Teacher will not be permitted to reside in school accommodation or travel on any school transport without authority gained from the Principal of the Senior School or Assistant Head (Pastoral).

All records should be forwarded to the Human Resources Manager for secure storage.

Contractors

Contractors engaged to work during term time by the Foundation must complete the same checks for their employees that the School is required to complete for its staff. If the Contractor is working in an area which is segregated from pupil access then checks may not be required, subject to appropriate supervision. The Foundation requires confirmation that these checks have been completed before employees of the Contractor can commence work at the Foundation.

Governors

The Chair of Governors will complete a DBS with the DfE and will not be able to commence office until the DBS has been received. The Chair will also be responsible for ensuring that the Governing Body of the Foundation are all suitably checked.

Volunteers

The Foundation 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 Foundation.

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

It is The Foundation's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with The Foundation for three consecutive months or more. These volunteers who are likely to be involved in activities with The Foundation on a regular basis may be required to sign up to the DBS update service as this permits The Foundation to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition The Foundation will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):

- Character references from the volunteer's place of work or any other relevant source;
- A completed Disqualification by Association form (if applicable) and signed confirmation that they have read the Safeguarding and Keeping Children Safe in Education documents;
- An informal safer recruitment interview.

Single Central Register

An entry will be made for all current members of staff, Governors, Volunteers, supply staff and those employed by third parties.

Appendix

Policy on the Recruitment of Ex-Offenders

The Foundation will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. The Foundation makes appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar him/her from employment within the Foundation. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for the Foundation to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for the Foundation to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful for the Foundation to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the Disqualification under the Childcare Act 2006 (June 2016), whether by association, or otherwise.

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the Foundation. The Foundation will report the matter to the Police and/or the DBS if:

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

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 Foundation will consider the following factors before reaching a recruitment decision:

- 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;
- In the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
- The circumstances surrounding the offence and the explanation(s) offered by the convicted person.

If the post involves regular contact with children, it is the Foundation's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any of the following offences: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence, 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 Foundation'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 Foundation's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving.