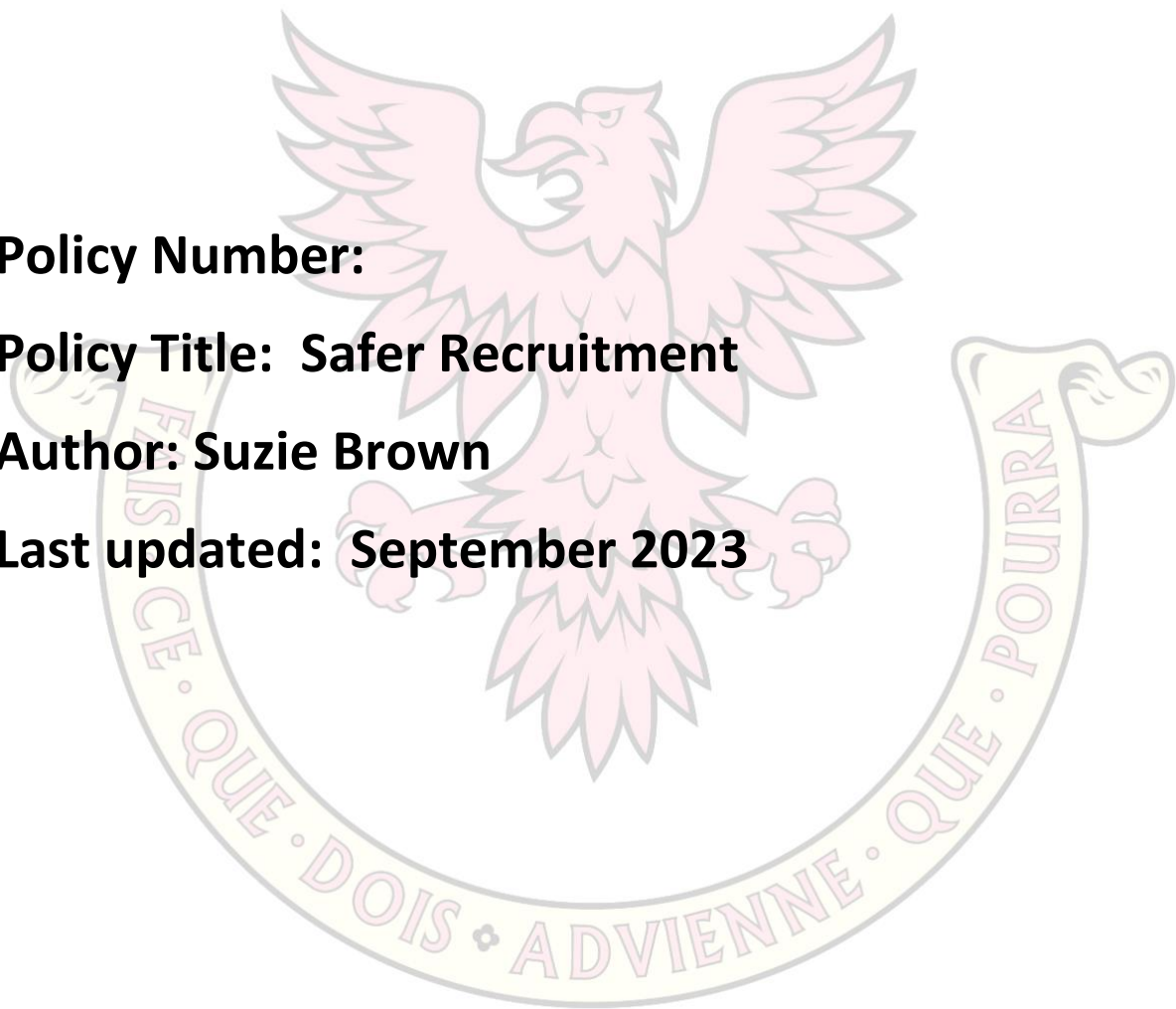


Policy Number:

Policy Title: Safer Recruitment

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Safer Recruitment Policy

Whole School Policy (including EYFS and Boarding)

Approved by the Principal Dated

0. POLICY STATEMENT

1.1 We aim to attract, recruit and retain high quality teachers and staff, whilst at the same time ensuring that the welfare of the children at Hall Grove is protected. As an accredited Investors in People organisation, the school takes its employment responsibilities seriously.

1.2 The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in education. We are committed to safeguarding and promoting the welfare of all pupils in its care by having effective and robust safer recruitment practices to deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in school. As an employer, the school expects all staff and volunteers to share this commitment.

1. AIMS AND OBJECTIVES

1.1 The aims of the Safer Recruitment policy are to help deter, reject, prevent or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff and for observing and supervising staff once they start work. We will aim:

- 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 including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2023 (KCSIE), the Prevent Duty Guidance for England and Wales (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
- to ensure that we meet our 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.

1.2 The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to, pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at the School.

2. ROLES AND RESPONSIBILITIES

2.1 It is the responsibility of the Senior Leadership Team to ensure that the school has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements, and to monitor our compliance with them.

2.2 The Principal shall lead in all appointments. Others may be involved in staff appointments but the final decision will rest with the Principal.

2.3 The Compliance Manager, Suzannah Brown, is responsible for ensuring that we operate safe recruitment procedures and making sure all appropriate checks are carried out on all staff who work at the school, whether directly employed by the school, employed by a third party such as a club provider or contractor, contracted through an agency or self-employed.

3. RECRUITMENT AND SELECTION PROCEDURE

3.1 Advertising

To ensure equality of opportunity, so far as is practicable, the school will seek to advertise vacant posts to encourage as wide a field of applicants as possible.

Any advertisement will make clear our commitment to safeguarding, keeping children safe from harm and promoting their welfare, and make clear that safeguarding checks will be undertaken. The advertisement will include details of the safeguarding responsibilities of the post. It will also state that the post is exempt from the Rehabilitation of Offenders Act 1974 (as amended) and that the school is committed to equal opportunities, welcoming applications from all those who meet the essential requirements of a particular role.

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA) and GDPR.

3.2 Application Forms

All applicants for employment will be required to complete an Application Form containing questions about their academic and full employment history, and their suitability for the role. CVs will not be accepted on their own as they may not include all relevant information required to support safer recruitment.

3.3 References

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the school. Where possible, references will be obtained before the interview stage.

One of the references must be from the applicant's current or most recent employer, completed by a senior person with appropriate authority. If the referee is school or college-based, the reference should be confirmed by the headteacher/principal as accurate in respect of disciplinary investigations.

If the current/most recent employment does/did not involve work with children,

then one of the references should be from the employer with whom the applicant most recently worked with children. If the applicant has never worked with children, a reference must be obtained from their current employer.

References will always be sought and obtained directly from the referee; and their purpose is to provide objective and factual information to support appointment decisions.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Any discrepancies or anomalies will be followed up.

We will take steps to verify that both the referee and the organisation are bona fide. Referee identities and contact details will be verified using official school websites and, if appropriate, professional directories/sources. All references must contain the referee's name, job title and a landline number. Referees should be contacted directly, using business telephone numbers or business email addresses where possible. Where electronic references are received, we will verify that they originate from a legitimate source. Direct contact by phone may be undertaken to verify the reference, particularly if any discrepancies or adverse information are revealed, or where vague or insufficient information is provided.

The school does not accept open references, testimonials or references from relatives.

3.4 Shortlisting and Interviews

Shortlisted applicants will be required to sign a self-disclosure form regarding convictions and working with children. At least two people will carry out the shortlisting exercise and, so far as possible, the same people will carry out the interview to ensure a consistent approach. Particular attention will be paid to any gaps or discrepancies in employment history and the reasons given for them.

There will be a face-to-face interview so far as is reasonably practicable. Reasonable

adjustments will be made where possible to meet the needs of applicants in the interview process. The interview will explore the applicant's ability to carry out the role and will explore any inconsistencies or gaps identified as well as their experience of dealing with safeguarding issues relating to children, their attitude towards and motivation for working with children, and their ability to establish and maintain relationships with children.

Any information relating to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstances of the individual case during the interview process, if it has not been disclosed on the application form.

Candidates may be asked to teach a group of children with appropriate supervision in order that staff can observe their interaction with children and teaching style.

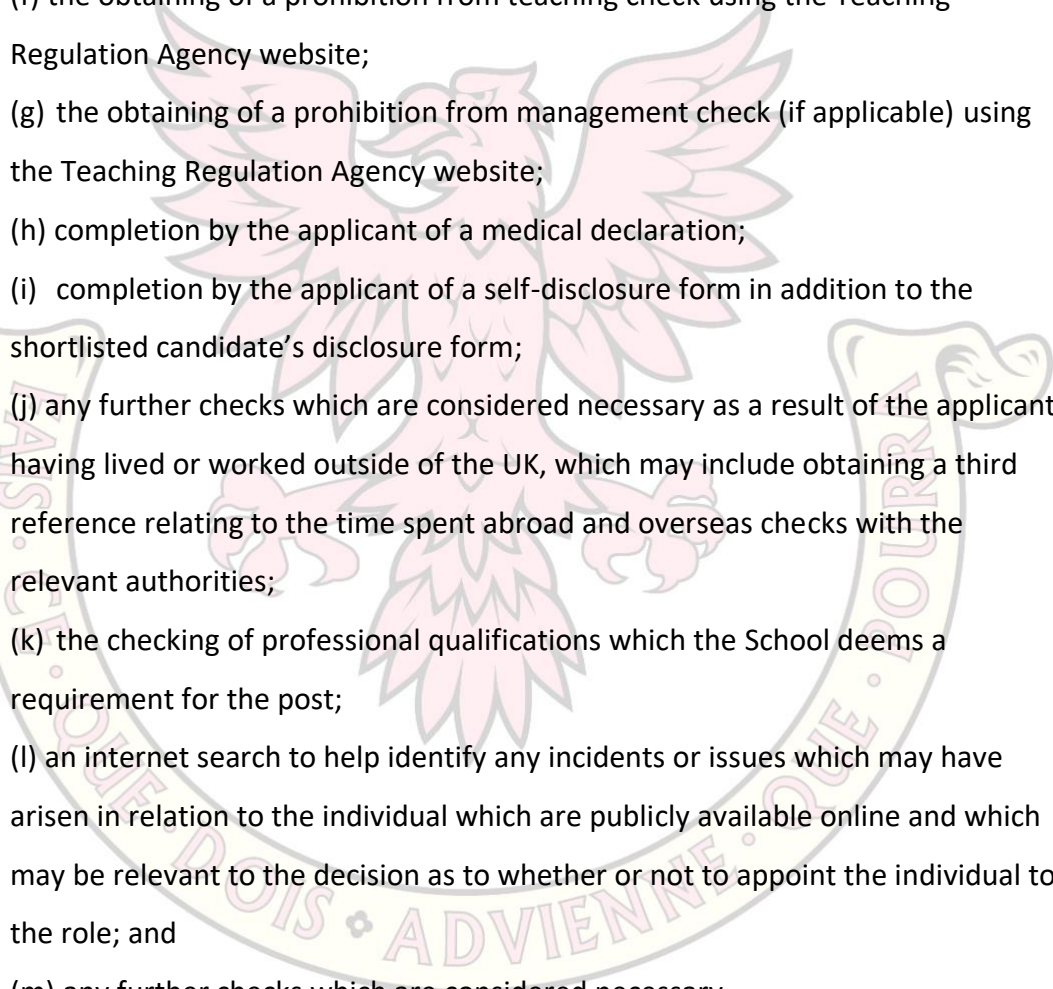
Successful applicants will be required to provide evidence of their identity, address and qualifications. Original documents only will be accepted and photocopies will be taken.

5. OFFER OF APPOINTMENT AND NEW EMPLOYEE PROCESS

5.1 In accordance with the recommendations set out in KCSIE and the requirements of the Education (Independent School Standards) Regulations 2014 and the *Boarding Schools: National Minimum Standards*, the school carries out a number of pre-employment checks in respect of all prospective workers, whether or not directly employed. These are undertaken by a member of staff specifically tasked and trained in the requirements of the regulations with the welfare of the children being of paramount importance at all times during the process.

5.2 If it is decided to make an offer of employment following interview, any such offer will always 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; and
- the satisfactory completion of pre-employment checks including:
 - (a) verification of the applicant's identity;

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- (b) verification of the applicant's right to work in the UK;
 - (c) the receipt of two references (one of which must be from the applicant's most recent employer) which the school considers to be satisfactory;
 - (d) the obtaining of an Enhanced DBS certificate, the original of which must be produced to the Compliance & HR Manager;
 - (e) the obtaining of a separate Children's Barred List check (if not included in the DBS certificate) using the Teaching Regulation Agency website;
 - (f) the obtaining of a prohibition from teaching check using the Teaching Regulation Agency website;
 - (g) the obtaining of a prohibition from management check (if applicable) using the Teaching Regulation Agency website;
 - (h) completion by the applicant of a medical declaration;
 - (i) completion by the applicant of a self-disclosure form in addition to the shortlisted candidate's disclosure form;
 - (j) any further checks which are considered necessary as a result of the applicant having lived or worked outside of the UK, which may include obtaining a third reference relating to the time spent abroad and overseas checks with the relevant authorities;
 - (k) the checking of professional qualifications which the School deems a requirement for the post;
 - (l) an internet search to help identify any incidents or issues which may have arisen in relation to the individual which are publicly available online and which may be relevant to the decision as to whether or not to appoint the individual to the role; and
 - (m) any further checks which are considered necessary.

A personnel recruitment checklist is used to track and audit paperwork obtained in accordance with safer recruitment training. The checklist is retained on personnel files.

A single central record of recruitment and vetting checks (the Single Central Register) is maintained in accordance with the Education (Independent School Standards) Regulations 2014 requirements.

6. DISCLOSURE & BARRING SERVICE (DBS) CERTIFICATE

- 6.1 The school is required to obtain an Enhanced disclosure check from the DBS and a check of the Children's Barred List check in respect of all positions at the school which amount to "regulated activity" as defined in the relevant regulations and guidance.
- 6.2 It is unlawful for the school to employ anyone who is barred from working with children as revealed by a check of the Children's Barred List. It is a criminal offence for any person who is barred from working with children to apply for a position at the school. All posts are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants will be made aware that providing false information is an offence and could result in the application being rejected, or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.
- 6.3 It is an absolute requirement that these checks must be sought before the commencement of employment of any new worker. In addition any worker who takes leave for more than three months (ie: maternity leave, career break etc) must be re-checked before they return back to work. If the application for a DBS Certificate is still being processed at the time of commencement, a separate Barred List check will be undertaken and a risk assessment carried out. The safety and welfare of the children are of paramount importance and, if a decision is taken to permit the worker to start work before the DBS Certificate is available, this will be subject to close supervision by a fully-checked member of staff and will only be

done where all other checks, including a separate Barred List and prohibition from teaching check, have been completed.

6.4 The school may 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.

7. DEALING WITH CONVICTIONS

7.1 If a DBS Certificate is returned with details of convictions, consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance to the post of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- the circumstances of the offence,
- decriminalisation and remorse, and whether the individual has accepted responsibility for their actions
- If the applicant is applying for a teaching post, the school will consider the incident in the context of Teachers' Standards and Teacher misconduct guidance (referring to KCSIE).

7.2 Depending on the nature of the disclosure, a formal meeting may take place face-to-face to establish the facts with the applicant. A decision will be made following this meeting. The school will evaluate all of the risk factors above before a position is offered or confirmed, with the safeguarding of children being the foremost concern.

7.3 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 the disputed information, the school may, where

practicable and at its absolute discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information, but is under no obligation to do so.

8. PORTABILITY OF DBS CHECKS

8.1 Staff may wish to join the DBS Update Service if they are likely to require another check in the future. Applicants may sign up to the Service for an annual fee, which is payable by the applicant. This allows for portability of a Certificate across employers.

8.2 We will:

- Obtain consent from the applicant to carry out an update search.
- Confirm the Certificate matches the individual's identity.
- Examine the original certificate to ensure that it is for the appropriate workforce and level of check, ie enhanced certificate/enhanced including barred list information, for child workforce.

8.3 The Update check will identify and advise whether there has been any change to the information recorded since the initial Certificate was issued.

8.4 In appropriate cases, the school may rely upon an existing Certificate using the "3 month rule" if the applicant can fulfil the criteria set out in the regulations. If a decision is taken to rely upon an existing Certificate in this way, a separate Barred List check will be undertaken.

8.5 If the 3 month rule cannot be relied upon and the Applicant has not subscribed to the Update Service, we will require the Applicant to apply for a new DBS Certificate.

9. CONTRACTORS AND AGENCY STAFF

- 9.1 Contractors engaged by the school must complete the same checks for their employees that we are required to complete for staff. The school requires written confirmation that these checks have been completed before employees of the Contractor can commence work at the school. If there are any gaps in the checks carried out by the Contractor, the Compliance & HR Manager will undertake these to ensure the full checking process has been completed.
- 9.2 Agencies who supply staff to the school must also complete the pre-employment checks which we would otherwise complete for staff. Again, the school requires written confirmation that these checks have been completed before an individual can commence work here. If there are any gaps in the checks carried out by the contractor, we will undertake these to ensure the full checking process has been completed.
- 9.3 The school will independently verify the identity of staff supplied by contractors or an agency and will require sight of the original DBS certificate before contractor or agency staff can commence work at the school. A separate Barred List check and prohibition from teaching check will also be undertaken. The worker will also be required to sign a self-disclosure form.

10. VISITORS, VISITING SPEAKERS (AND PREVENT DUTY)

- 10.1 The Prevent Duty Guidance requires the school to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.
- 10.2 The school is not entitled to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the school or perform any other regular duties for or on our behalf.
- 10.3 All visiting speakers will be subject to the school's usual visitors signing-in protocol. This will include signing in and out at the School Office, the wearing of a visitor's badge

at all times and being escorted by a fully vetted member of staff between appointments.

- 10.4 The school will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the school. In doing so we will always have regard to the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

"'Extremism' is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations."

- 10.5 In fulfilling its Prevent Duty 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 or age.
- 10.6 Visiting professionals, such as speech and language therapists, educational psychologists etc, will be asked to provide original photo ID and sight of their original DBS certificate.
- 10.7 Other visitors, such as parents attending sports matches or informal music concerts, are not expected to provide DBS certificates. They are not permitted to enter the school buildings, other than as invited by staff and will not be left alone with children.

11. RECORD KEEPING AND RETENTION

- 11.1 The school is legally required to undertake the above pre-employment checks. Therefore, if an Applicant is successful in their application, we will retain on their personnel file any relevant information provided as part of the application process. Information is also held electronically in iSAMS and on the Single Central Register. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help

the school to discharge its obligations as an employer e.g. so that the School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

11.2 This documentation will be retained by the school for the duration of the successful Applicant's employment with us and for a reasonable period of time after the end of employment. All information retained on employees is kept centrally in a locked and secure cabinet.

11.3 We comply with the requirements of the GDPR.

12. INDUCTION AND SUPERVISION

12.1 All new employees are given an induction programme which clearly identifies the school's policies and procedures, including the Safeguarding and Child Protection Policy, the Code of Conduct and KCSIE, and make clear the expectations which will govern how staff carry out their roles and responsibilities.

12.2 All new employees will be employed subject to a probationary period during which they will be regularly observed and supervised.

12.3 We operate a system of regular appraisals for staff members. Lesson observations are conducted and feedback provided.

13. LEAVING EMPLOYMENT AT HALL GROVE

Despite the best efforts to recruit safely, there may be occasions when allegations of serious misconduct or abuse against children and young people are raised. This Policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks, safeguarding is an ongoing priority and the school also has a legal duty to make a referral to the DBS in circumstances where an individual:

- a. has applied for a position at the school despite being barred from working with children; or
- b. 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, we may also be obliged to make a referral to the Teaching Regulation Agency.

September 2023 (SB)

