

Safer Recruitment Policy

Applies to:

- All staff (teaching and non-teaching), the directors and volunteers working in the School.

Availability:

This policy is made available in the following ways:

- The School's website www.radnor-sevenoaks.org;
- Via Teams, All Staff Shared Documents, Compliance, Policies;
- On request a copy may be obtained from the School's Office.

Monitoring and Review:

- This policy will be subject to continuous monitoring, refinement and audit by the Head.
- The Board of Directors undertake a formal annual review of this policy.

Signed:



David Paton
Head



Ian Davies
Chairman of the Board of Directors

Reviewed: September 2024
Next Review: September 2025

1. Introduction

- 1.1 Radnor House (“the School”) is committed to ensuring the best possible environment for the children and young people in its care. 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 members of staff of the highest calibre and integrity who share this commitment.
- 1.2 Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.
- 1.3 The School fully recognises its responsibilities with regard to safer recruitment. We therefore seek to comply with the guidance provided by the Department for Education (DfE) and the Independent Schools Inspectorate (ISI) concerning the safeguarding of children and safer recruitment in education.
- 1.4 The School aims to:
 - ensure that thorough recruitment procedures and pre-employment vetting for appointing all staff including volunteers and contractors enables the School to deter, identify and reject any person deemed unsuitable to work or come into contact with our pupils; and,
 - operate such procedures consistently and thoroughly whilst obtaining, collating, analysing and evaluating information from and about applicants, and those potentially going to work with children.
- 1.5 It therefore seeks to ensure compliance with all current relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping children safe in education (KCSIE) 2024, Disqualification under the Childcare Act 2006 (DUCA), 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).

2. Employment and Safer Recruitment

- 2.1 All members of the teaching and support staff at the School, including part-time staff, temporary and supply staff, contractors, volunteers and visiting staff, such as peripatetic musicians and sports coaches, are checked in accordance with the full requirements of the Disclosure and Barring Service (DBS) and the centralised record (Single Central Register) before starting work.
- 2.2 The current required checks include identity, right to work in the UK, qualifications, medical fitness, employment history, enhanced DBS (including barred check), separate barred list check as appropriate, disqualification from childcare, prohibition from teaching and management as appropriate, overseas police as appropriate, references and a basic online search.
- 2.3 The chairperson of the interview panel must have completed, and remain up to date with the requirements of, safer recruitment training and assessment.
- 2.4 Our safer recruitment practice includes those persons who may not have direct contact with young people but because of their presence will still be seen as safe and trustworthy, e.g. volunteers, support staff and contractors.
- 2.5 We understand that it is an offence under the Disclosure and Barring Service legislation to knowingly employ (or take on as a volunteer), in a DBS-regulated activity, someone who is barred from such activity. See Appendix B for the definitions of Regulated Activity and

deciding whether a person is engaging in regulated activity.

- 2.6 We will do all we can to ensure that all those working with children in the School are suitable people. This involves scrutinising applicants, verifying their identity, checking their employment history and qualifications and obtaining independent professional and character references that answer specific questions to help assess their suitability for working with children.
- 2.7 Staff recruitment checks will also include self-employed contractors arranged by the School e.g. peripatetic staff and coaches and will apply to those paid directly by parents e.g. therapists. As such if a person is in regulated activity in the School they are treated as staff for the purposes of vetting.
- 2.8 The principles of safer recruitment are included in the terms of any agreement drawn up between ourselves and the contractors or agencies which provide services for us.

3. Recruitment and Selection

3.1 Advertisements

- All vacancies will be advertised on the School's website, job boards and recruitment agencies as appropriate.
- All advertising regarding employment, will carry the following wording:
The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Applicants will be required to undergo child protection screening appropriate to the post, including checks with past employers and the Disclosure and Barring Service (DBS) for an Enhanced Disclosure.
- Safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children will be included in the advertisement.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.
- All job advertisements and job application packs will include the following documents:
 - Safeguarding Policy
 - Staff Code of conduct
 - Safer Recruitment Policy
 - Application Form
 - Job Applicant Data Privacy Notice
 - Job Description

4. Application forms

- 4.1 All applicants are required to complete an Application Form (the 'Form') containing questions about their academic and employment history, this must be the full history and

suitability for the role. A curriculum vitae will not be accepted in place of the completed application form, however, it may be submitted alongside.

4.2 Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity).
- All internal applicants for externally advertised posts will need to follow the same process as that followed by external applicants including the submission of complete application forms. For posts that are exclusively internally advertised a cover letter and CV will be required.
- Our application form also requests more detailed information regarding teaching experience, special areas of teaching interest, and any relevant training undertaken recently (e.g. First Aid course).

5. Shortlisting

- 5.1 At least one member of a Selection Panel will be trained in Safer Recruitment as required by School Staffing (England) Regulations (2009). Safer recruitment training of the staff concerned is refreshed every three years.
- 5.2 When reviewing applications we know it is important to record objective evidence about the extent to which each candidate meets the criteria. The School has at least two people involved in the process of scrutinising applications and shortlisting candidates.
- 5.3 Shortlisted candidates will complete a self-declaration form to determine whether they are eligible or not for the role based on barring or childcare disqualification requirements and to inform discussions at the interview stage in relation to the information disclosed. The School will compare the information on this form to the DBS records, and the Head of HR and Chair of the interview will decide on whether or not the candidate should be appointed.
- 5.4 The School will shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. At least two people will carry out the shortlisting exercise; consider any inconsistencies; look for gaps in employment and reasons given for them; and explore all potential concerns. Shortlisted applicants will then be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail.
- 5.5 The School will also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

6. References

- 6.1 The School will aim to obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at the interview.
- 6.2 When seeking references the School will:
 - Not accept open references
 - Liaise directly with referees and verify any information contained within references with the referees

- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school-based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any concerns before any appointment is confirmed.

7. Interview Process

- 7.1 Candidates will be invited to interview using an 'invite to interview' letter outlining arrangements for the day, asking them whether they require any reasonable adjustments to attend the interview, and asking them to provide the following original documents at the interview:
- A birth certificate and other photographic identification.
 - 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 applicable, proof of entitlement to work and reside in the UK. Originals of the above are necessary.
 - Qualified teacher status or qualifications appropriate for the position;
 - Where appropriate, any documentation giving evidence of a change of name.
- 7.2 Should the application form be sent electronically, the candidate must sign the application form in person when attending the interview.
- 7.3 The Interview:
- We conduct a face-to-face panel interview to explore the candidate's suitability to work with children as well as their suitability for the position being recruited.
 - The panel will consist of at least two, and preferably three, members of staff including one who has been trained in safer recruitment and a second who has the authority to make the decision on the appointment.
 - A consensus about the required standards for the post will be reached and issues considered and explored in the interview in line with the agreed assessment criteria.
 - The panel will assess the candidate's attitude towards children and young people and their ability to support the safeguarding policies as well as the aims of the School.
 - Questions relating to child protection and safeguarding children will be asked in every interview for staff and volunteers prior to an offer of appointment.
 - We will not ask questions regarding health at the interview. A successful candidate is

then required to complete a self-declaration medical health questionnaire.

- Interview notes will be made and copies retained on the relevant personnel files.
- Lesson Observations for teaching positions, where possible, the candidate will be observed teaching a lesson and notes kept of the outcome of the observation.

8. Pre-appointment vetting checks

- 8.1 In accordance with the recommendations set out in KCSIE, DUCA and the requirements of the ISSRs the School carries out pre-employment checks in respect of all prospective staff.
- 8.2 In fulfilling its obligations to carry out pre-employment checks 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, gender reassignment, disability or age.
- 8.3 The School will record all information on the checks carried out in the School's Single Central Record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

9. New staff

- 9.1 All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:
 - Verify their identity.
 - Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, the appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we keep a record of the fact that vetting took place, the result of the check and the recruitment decision taken.
 - Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
 - Verify their mental and physical fitness to carry out their work responsibilities.
 - Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
 - Verify their professional qualifications, as appropriate.
 - Ensure they are not subject to a prohibition order if they are employed to be a teacher.
 - Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.

- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state.
- The School will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

10. Regulated Activity

- 10.1 Responsible, on a regular basis at the School, for teaching, training, instructing, caring for or supervising children; or
- 10.2 Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- 10.3 Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

11. Agency and third-party staff

- 11.1 We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person to whom the checks have been made.

12. Contractors

- 12.1 The School will ensure that any contractor, or any employee of the contractor, who is to work at the School has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:
 - An enhanced DBS check with barred list information for contractors engaging in regulated activity
 - An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
 - Obtain the DBS check for self-employed contractors.
 - The School will not keep copies of such checks for longer than 6 months.
- 12.2 Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- 12.3 The School will check the identity of all contractors and their staff on their arrival.
- 12.4 For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such

checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

13. Volunteers

- 13.1 The School will never leave unchecked volunteers unsupervised or allow them to work in regulated activity.
- 13.2 Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- 13.3 Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- 13.4 Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

14. Governors

- 14.1 All governors will have an enhanced DBS check with barred list information if working in regulated activity.
- 14.2 All proprietors, trustees, local governors and members will also have the following checks:
 - A section 128 check (to check the prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
 - Identity.
 - Right to work in the UK.
 - Other checks deemed necessary if they have lived or worked outside the UK.

15. Policy on recruitment of ex-offenders

- 15.1 The School will not unfairly discriminate against any applicant for employment on the basis of conviction or other details revealed. The School makes appointment decisions on the basis of merit and ability.
- 15.2 If an applicant has a criminal record this will not automatically bar them from employment within the School. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.
- 15.3 All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must declare all previous criminal convictions and/or cautions or bind-overs, including those prior to 18 years of age, or which would normally be considered "spent" except for those to which the DBS filtering rules apply. The candidate is not required to disclose convictions or cautions that are 'protected', as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020). A failure to disclose a previous conviction (which should be declared, including those spent, or in childhood) 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 amount to a criminal offence.

15.4 It is unlawful for the School to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to attempt 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.

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

15.6 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 any of the following offences:

- Murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or
- 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 ten years.

16. Single Central Register

16.1 The School maintains a Single Central Register of staff appointments, including volunteers and others brought into the School to provide additional teaching or instruction (such as sports coaches), supply staff and governors in accordance with the guidance of the DfE.

17. Retention of Records and Security of Disclosure Information

17.1 The School is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the School will retain on his/her personnel file (paper and/or electronic) any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK,

medical fitness and qualifications.

- 17.2 Disclosure information and other confidential documents issued by the DBS are securely stored, with access only permitted to persons designated by the proprietor for this purpose. These are securely destroyed after a period of six months.
- 17.3 This documentation will be retained by the School for the duration of the successful applicant's employment with the School. It will be retained for a period of seven years (minimum) after employment terminates, after which time it will be securely destroyed.
- 17.4 If the application is unsuccessful, all documentation relating to the application will be confidentially destroyed after six months.
- 17.5 The School will keep a record of the date of disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken with access only permitted to persons designated by the proprietor for this purpose.

18. Duty to refer

- 18.1 The School has a duty to refer to agencies as part of our safeguarding responsibility. Consequently, the School will refer to the Disclosure & Barring Service (DBS) when an individual has applied despite being barred from working with children or is removed from regulated activity or has resigned prior to being removed, because they have harmed, or pose a risk of harm to a child.
- 18.2 If the individual referred to the DBS is a teacher the School may make a referral to the Teaching Regulation Agency (TRA) as and where appropriate.

19. Equal Opportunities

- 19.1 The School does not discriminate between candidates on the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation.
- 19.2 The School is mindful of the requirements relating to the recruitment of ex-offenders whilst taking into account its safeguarding responsibilities.

Appendix A: Recruitment Procedures

The importance of safeguarding

At each stage of our recruitment process, **we are mindful of the need to protect and safeguard children and to ensure that their welfare is promoted at all times.** There is a thorough and consistent process of obtaining, collating, analysing and evaluating information about applicants and in order to ensure safe recruitment, the School will ensure that through safer recruitment advertising and pre-interview information, it will be made clear the commitment to safeguarding and promoting the welfare of children.

Comprehensive details

We require all adults employed in School to complete the application form which requests comprehensive details regarding dates of an applicant's training and employment history to enable the School to identify any gaps in training and employment to alert the interview panel. Any gaps will be recorded by the panel giving a satisfactory explanation for those gaps. The application form will ask candidates if they wish to declare anything in light of the requirement for a DBS disclosure. The application form will also ask for details regarding the length of service in previous employment.

If a candidate's application is considered to be fraudulent or contains false information, the School will report the matter without delay to the Secretary of State via the DfE and also the police as appropriate.

Application procedures

With reference to the application process, the School has the following procedures in place:

- We ask all applicants to complete an application form specific to the role. A curriculum vitae alone will not provide sufficient information, although it can be presented alongside the application form.
- We ensure that the job description makes reference to the responsibility for safeguarding and promoting the welfare of children and young people.
- We obtain and scrutinise comprehensive information from applicants taking up and satisfactorily resolving any discrepancies or anomalies that are identified.
- We obtain two independent professional and character written references, including 'Safer Recruitment' questions that ask specific questions to help assess an applicant's suitability to work with children. Information from references is compared with information on the application form to ensure that the information provided is consistent and any concerns identified will be followed up. Verification will be sought that the referee has actually completed the reference.

The School shortlists applicants by checking for the following and exploring further at the interview:

- Gaps in employment.
- Information disclosed on the self-disclosure form regarding barring or childcare disqualification requirements to inform discussions at the interview.
- Any period of three months or more spent overseas during the previous ten years. A Police Check will need to be obtained for the country where the applicant spent time if the appointment is made.
- Reasons for repeated and regular changes in employment.
- Anomalies or discrepancies in information contained within the application.

- The School will check shortlisted applicants' employment history and online activity, including social media. All candidates are assessed equally against the criteria in the job description, without exception.

Reasonable Adjustments

The School recognises the contribution all staff can make and values diversity and inclusion across the community. As an equal opportunities employer, the School is committed to equality of opportunity and to providing a workplace culture and practices which are free from unfair and unlawful discrimination. Applicants and staff must not be subjected to workplace disadvantages due to their disability, in comparison to a non-disabled individual, where an available reasonable adjustment can be put in place. As such, applicants are encouraged to inform the school of any reasonable adjustments that they may need when called to interview allowing for pragmatic discussions to take place at an early stage in the employment process.

The Equality Act 2010 prohibits prospective employers from asking about a job applicant's health except in certain specified circumstances which include to:

- i) establish whether the applicant can take part in an assessment to determine their suitability for the job;
- ii) determine whether any reasonable adjustments need to be made to enable a disabled person to participate in an assessment during the recruitment process;
- iii) find out whether a job applicant would be able to undertake a function that is intrinsic to the job;
- iv) monitor diversity among job applicants.

Applicants are advised to read the job description in detail to ensure they are clearly aware of the exact nature of the role and are encouraged to share any information with the School regarding any reasonable adjustments they foresee to be able to fulfil the duties of the position. and in particular, they will be able to manage (with the relevant risk assessments and control measures in place), the hazards associated with the role.

Requirements for candidates include:

Teaching Staff

To be able to undertake teaching duties safely and effectively, it is essential that individual teachers:

- have the health and wellbeing necessary to deal with the specific types of teaching and associated duties (adjusted, as appropriate) in which they are engaged;
- are able to communicate effectively with children, parents and colleagues;
- possess sound judgment and insight;
- remain alert and focused at all times;
- can respond to pupils' needs rapidly and effectively;
- are able to manage classes;
- do not constitute any risk to the health, safety or well-being of children;
- can, where disabilities exist, be enabled by reasonable adjustments to meet these criteria.

Support Staff

To be able to undertake support duties safely and effectively, it is essential that individuals support employees:

- have the ability to deal with the specific job role for which they are engaged;
- are able to communicate effectively and well;

- possess sound judgment and insight to a level required by the post;
- remain alert and focused at all times;
- can, if appropriate, respond to pupils' needs rapidly and effectively;
- are able, if appropriate, to cover a class;
- do not constitute any risk to the health, safety or well-being of children;
- can, where disabilities exist, be enabled by reasonable adjustment to meet these criteria.

Conditional offer of employment

Should it be decided to make an offer of employment following the formal interview, any such offer will be conditional on the school receiving two satisfactory references (including, for teaching staff, one from the applicant's current school). Furthermore the offer will include the agreement of a mutually acceptable start date and the signing of a contract incorporating the school's standard terms and conditions of employment together with any additional stipulations regarding the specific role and responsibilities of the post offered.

Additionally, any offer of appointment to the successful candidate is conditional upon satisfactory completion of all pre-employment checks relevant to the specific post, as follows:

- identity verification (e.g. passport or driving license or birth certificate or marriage/divorce certificate) and two documents demonstrating proof of current address (e.g. utility bills);
- verification of the right to work in the UK;
- barred list check;
- successful DBS clearance - sight of an original certificate for an enhanced disclosure;
- check that a candidate to be employed as a teacher (including peripatetic music, SEN, EAL and private tutors and sports coaches) is not subject to a prohibition from teaching order;
- check that any person to be employed or internally promoted as a manager is not subject to a prohibition from management order, managers include Head, Leadership Team (including Senior and Prep) Head of Faculty/ Department, Proprietor;
- check the candidate's mental and physical fitness to carry out their responsibilities: the candidate is asked to make a self-declaration;
- minimum of two suitable employment references;
- verification of overseas criminal records checks for anyone who has lived and worked outside the UK for a period of three months or more during the previous ten years: details listed on the DBS website for each country (<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>). (in the absence of a response from official overseas sources or if the country in question does not have suitable systems in place the school will carry out further checks such as additional references before the person starts work.)
- disqualification from early years and childcare must be checked – the candidate working with children aged eight and under must complete a self declaration and the school will carry out a new declaration request annually for all relevant staff.
- verification of appropriate qualifications for the post applied for, with sight of original certification.

We will always carry out all relevant checks, as if the person was a new member of staff, if an existing staff member moves to work in a regulated activity where their previous work was not checked. We undertake to do the same if we are concerned about the suitability of any existing member of staff. We always see the original certificate, including the DBS check from the candidate. We use the DBS Update Service, where the applicant or individual joins this service. Together with the individual's prior

permission, this provides us with an opportunity to carry out an online check to see if they need a new certificate because new information is available (www.gov.uk/dbs-update-service).

Commencing Employment Prior to Obtaining Enhanced DBS Clearance

Our procedures are followed in a professional and timely manner, therefore the vast majority of new employees will be in possession of the DBS Certificate before their contract start date. There will, however, be rare occasions when contracts start before the Enhanced DBS Certificate has been received.

In this instance, the Head will use his/her discretion as to whether an employee can start work pending the receipt of the certificate.

The Head will carry out a risk assessment to determine the safeguards to put in place such as supervision. Depending on the circumstances, loose supervision may be sufficient e.g. a teacher starting with a live DBS from their previous school. Where close supervision is deemed to be appropriate a 'Close Supervision Agreement' form will be completed, and the employee informed that they are under scrutiny and the reasons for it. Any supervision and safeguarding arrangements will be reviewed at least every two weeks. In all cases an extra Barred List Check must be carried out together with the satisfactory completion of all other relevant checks prior to the new employee commencing in post. Notes on such arrangements will be added to the Single Central Register.

Contractors

The school will have arrangements in place with contractors (including agency/supply and third-party staff) to make sure that any contracted staff that work regularly in our school, with an opportunity for contact with children, are deemed suitable. Contractors may include but are not limited to, catering staff, cleaners, bus drivers, supply teachers, agency workers and visiting professionals where there is regulated activity.

Although we do not carry out the required checks for any contractor, for any third party or agency staff we require written confirmation that the contractor has obtained a barred list check, an enhanced DBS check and any other required checks, before they work on a regular basis or in regulated activity in our school. (See appendix B for definition). Where a contractor is self-employed, we can obtain the DBS check and run the necessary checks on their behalf. Upon arrival to the School, contractors will have their photo ID verified and their original DBS certificate will be checked. They must always sign in before entering the school, both when children are present and otherwise for fire, and health and safety considerations.

Occasional Visitors

The school has processes in place for occasional visitors (including visiting speakers, occasional contractors and ad-hoc visiting professionals) to make sure that those who visit our school and have an opportunity for contact with children, are deemed suitable.

For occasional contractors who have regulated activity the checks described above for Contractors will be followed. For those who will not have regulated activity such as ad-hoc tradespeople or school photographer, we will not undertake barred list or DBS checks but these visitors will be supervised or escorted around the premises. Furthermore, they must always sign in before entering the school, both when children are present and otherwise for fire, and health and safety considerations. Those visitors who are supervised will wear a yellow lanyard to clearly identify themselves as having such status. In addition, a close supervision form will be completed by the visitor and the responsible staff member(s) to ensure all parties understand and follow the procedure.

For visiting speakers, there are additional protocols to follow to ensure that these visitors are suitable and appropriately supervised which falls within the scope of the *Prevent* duty. A visiting speaker's risk assessment will be completed and the organiser will ensure an internet search is conducted to help assess

the speaker's suitability and conduct a prior meeting to check the content or the presentation. We expect all contractors, third-parties and visitors to have photographic ID on site so that their identity can be checked before they work in our school and so that we can make sure the checks carried out have been made on the person completing the work.

Volunteers

A voluntary member of staff is someone who volunteers his/her time, skills and abilities to the school free of charge. These volunteer helpers are usually parental helpers, members of the local community or individuals committed to a particular career path who wish to gain experience in a school environment in pursuit of their chosen professional goals.

The same safeguarding procedures for paid staff are adopted for all volunteers with regular contact and in regulated activity with children.

The school will undertake fresh DBS checks on all volunteers who do not undertake any work at or for the school for a period of three consecutive months or more before they can return to volunteering duties.

The details of volunteers and the checks carried out on them will be entered on to the school's Single Central Register.

Volunteers working on an ad-hoc, one off basis (that is not more than once per term) will not be required to obtain DBS clearance, supply referees or attend an interview. The school will, in such cases, ensure the volunteer is never left alone or unsupervised in the presence of young people and does not undertake any kind of personal care. Examples of ad hoc occasions are day trips and sports days. As noted above with Occasional Visitors, a close supervision form and risk assessment must be completed for occasional volunteers.

Please refer to the school's Parent Volunteers Policy and Guidance Document 2019, for further information.

Appendix B: The Definition of Regulated Activity, and Associated Checks on Staff

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. This has been summed up in KCSIE Para 242 as:

“..... a person will be engaging in regulated activity with children if, as a result of their work, they:

- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children;
- will be working on a regular basis in a specified establishment, such as a school, for or in connection with the purposes of the establishment, where the work gives opportunity for contact with children; or
- engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.”

Where people are working or seeking to work in regulated activity relating to children, this allows an additional check, to be made, about whether the person appears on the children’s barred list, along with a check of the Police National Computer records plus additional information held by police as above. This is an Enhanced DBS Check with Barred List Information. The position being applied for or activities being undertaken must be eligible for an enhanced DBS check as above (regulated activity), and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check. In addition, this check can also include information as to whether an individual is subject to a section 128 direction.

KCSIE 2024 Paras 244 to 246 states “most staff in a school and those in colleges working with children will be engaging in regulated activity relating to children, in which case an enhanced DBS check which includes children’s barred list information, will be required. For all other staff (e.g. contractors) who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate. Barred list information must not be requested on any person who is not engaging in or seeking to engage in regulated activity.”