



## Safer Recruitment Policy

<b>Person responsible</b>	Head and Bursar
<b>Last update</b>	July 2023
<b>Frequency of Review</b>	Annual
<b>Date of next review by Governors</b>	Autumn 2023

## Purpose

Staff both paid and unpaid in the School are committed to promoting safeguarding and the welfare of our pupils. We recognise that safer recruitment is the first step in this process and ensures we meet the obligations under our Safeguarding (Child Protection) Policy and the DfE Guidance: Keeping Children Safe in Education (September 2022) (KCSIE). The School adopts a safe and robust recruitment process as well as attracting the best possible applicants for our vacancies.

The School recognises the value of its workforce and the seriousness of meeting its safeguarding aims and uses effective and thorough recruitment procedures to recruit and retain competent, motivated staff who are proficient in their roles and who come from diverse backgrounds. To achieve this aim we use a systematic, consistent and fair system so everyone is judged equally and we uphold the Equality Act (Oct 2010) in regards to discrimination.

## Introduction

This policy is to ensure the practice of safer recruitment of staff and volunteers appointed to the School to meet the highest standards and those determined by our Safeguarding (Child Protection) Policy and the DfE Guidance: Keeping Children Safe in Education (KCSIE), the code of practice published by the Disclosure and Barring Service (DBS), the Prevent Duty Guidance for England and Wales (2015 (the Prevent Duty Guidance), Part 4 Schedule to Education (ISS) Regulations 2014.

The School ensures by rigorous checks that we protect the children in our care and children are able to learn and develop in a safe and secure environment.

We aim to attract the best possible applicants for our vacancies and adopting vigorous safe recruitment practices and procedures is vital to identify, deter and reject people who are unsuitable to work with children. We ensure compliance with all relevant recommendations and guidance including the recommendations of the Disclosure and Barring Service (DBS) code of practice.

To ensure that the school meets its commitment to safeguarding and promoting the welfare of its pupils and as an integral factor in HR and recruitment, we carry out all the necessary pre employment checks.

## Principles and Practice

A well planned and structured procedure is vital to ensure that not only do we appoint the best person for the role, but to determine that they are suitable to work with children. The procedures gather a lot of information which is checked and considered as part of the whole process.

## Inviting Applications

All adverts wherever they are posted will clearly state the position of the School in regard to safeguarding by the inclusion of the following:-

The School is committed to safeguarding and promoting the welfare of children and applicants must be willing to undergo child protection screening appropriate to the post, including reference checks and for the successful candidate an enhanced Disclosure and Barring Service (DBS) check.

The advert also clearly states that 'all candidates must fill in our application form to be considered for this post' and that we are an equal opportunities employer. The advert makes clear the

qualities, qualifications and experience that are required and gives details of where to get additional information like the job description and person specification so that the potential candidate is clear about the School's expectations for the role.

## Application Information

Prospective applicants are supplied with the minimum following information:-

Application Form – which contains a declaration to sign off that the candidate is not disqualified from working with children and for the person to say that all information given on their application is correct. Our application form also asks candidates to provide the following information as part of their application, which will be searched should they be shortlisted:

- the social media platforms on which they have accounts;
- the account names/handles for all of their social media accounts, including any under a nickname
- or pseudonym;
- any websites they are involved with, in or featured on or named on; and
- any other publicly available online information about them of which the School should be made aware.

Job Description – which does have a statement, as per the advert, about our commitment to safeguarding and the welfare of our children and the requirement for enhanced DBS checks

Person Specification – list essential and desirable requirements for the role • Policy Statement on Recruitment (which includes details of the process) and that online searches will be conducted as part of our due diligence checks on shortlisted candidates.

Safer Recruitment Policy

Policy Statement on the Recruitment of Ex-Offenders

Equal Opportunity Form

## Selection and Shortlisting

All applicants as per our adverts must fill in an application form to be considered for the role and CVs alone will not be accepted. The application form provides the panel with details of the candidates academic and employment history as well as providing information to see if they are suitable for the role.

At least two people will be involved in scrutinising and selecting candidates to interview and at least one will have undertaken safer recruitment training. By using a panel to shortlist we are addressing concerns in relation to safeguarding (including online searches) and also unconscious bias. Our application form gives candidates the opportunity to give us all the information about their skills both in a paid and voluntary capacity to help eliminate bias and provide us with a full history of their working time.

By understanding the potential problems we have designed inclusive procedures to make our recruitment process transparent, fair and effective in making everyone feel welcome. The panel will individually analyse the applications according to the job criteria to keep the process objective and by using a grid to mark each applicant against the person specification, will then consult with the other member(s) of the panel to make the final selection for interview. They will check for discrepancies and gaps in employment, or repeated changes in employment which they will then

check and verify with the candidate either prior to or at interview, or with the referee(s) as appropriate. The Bursar will make a note on the HR file of the individual concerned.

The chosen applicants will be invited to the School for the interview schedule and references will be taken up before the final interview date when possible. Those candidates who have been shortlisted will also be told expressly that online searches may be done as part of due diligence checks. The application form states clearly that we will take up references before the interview so the candidate can give notice to their referee(s). If a reference has not arrived in time, or where an applicant has indicated he/she does not want their current employer to be contacted before the interview this will be followed up or requested as soon as the offer is accepted.

All appointment offers as per our letter are subject to satisfactory references and other checks being made.

References are sought directly from the referee. The School will not accept 'To whom it may concern' or other open references or testimonials provided by the applicant or family members. All referees are asked about the candidate's service, abilities, reason for leaving and their suitability for the post and to work with children. They are also asked if they have ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children and also if any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children. The School will also contact the referee directly to ensure that the reference has come from a legitimate source and make a note when it has been validated.

Candidates are all sent a form to declare any information that may appear on a DBS prior to interview. The School can then discuss this with the candidate and will advise the panel accordingly and if required the panel can discuss any disclosure with the applicant at the interview. As per our Policy Statement on the Recruitment of Ex-Offenders, (see Appendix) such information will not necessarily bar a candidate from employment.

### Interview Procedures

As part of the schedule and instructions given to candidates coming for interview are a request for them to bring original documents for photo ID and we ask for a current passport and photo card driving licence if available and proof of their right to live and work in the UK so we request paperwork showing their current address on a utility bill or bank statement, which is not more than three months old, unless it is that year's council tax bill which is acceptable.

The School will take copies and sign and date to say they have seen the originals and these will be kept securely. For the chosen candidate these documents will be kept on their HR file and for the unsuccessful candidates they will be locked away securely with the rest of the interview data for 6 months, after which the paperwork will be shredded. Where applicable candidates are requested to bring original professional certificates, which again will be copied by the School and signed and dated to say they have seen the originals.

The School sends out all information to candidates regarding interviews such as schedules and lesson information for teachers. Teachers will be asked to deliver a lesson which will be observed so that the panel can see how they interact with children as well as their teaching ability and planning. Teaching Assistants will be asked to do a task with a group of children to see their suitability for working with our pupils. Other staff may be asked to do tasks to demonstrate their skills/knowledge if required. The School will provide details where appropriate as early as possible, so that candidates can be well prepared and be hopefully at ease during the interview process so that they can give a fair and accurate impression of themselves.

The face to face interviews are designed to assess each candidate in terms of fulfilling the requisites of the job and in some roles what they can contribute to the extended curriculum. Interview questions will be designed according to the role to enable the panel to seek this information and to ascertain the level of knowledge, skills and competence of the applicant to fulfil the responsibilities of the role and their suitability to work with children. All candidates will be asked the same questions and in the same order and these will be marked on a grid.

At least one member of the interviewing panel will have done Safer Recruitment training and a safeguarding question will be asked at all interviews regardless of the role. Interviews will give the panel the opportunity to ask candidates about any gaps or anomalies in their work record or information given on their application so this can be clarified.

Candidates are also asked if we need to make any reasonable adjustments before coming for an interview to ensure all candidates are treated equitably.

### Pre & Employment Checks

Prior to taking up the post the following checks are made:-

Receipt of at least 2 satisfactory references – taken up prior to interview where possible and verified by School

Verification of the candidate's identity – current passport ID - part of interview process including where applicable change of name documentation

Production of evidence of the right to work in the UK where applicable – bills and bank statements must all be within the last 3 months or the current council tax bill - part of interview process

Verification of qualifications/professional status where applicable – certificates brought in as part of interview process

Enhanced DBS with Barred List Checks for Regulated Activity – if the candidate will be starting work prior to this arriving then a Barred Check List will be done. If the applicant has subscribed to the Update Service, with permission from the individual, the school will carry out an online check of the status of their certificate. If it is a volunteer, or governor not in regulated activity then an Enhanced DBS will be done, but no Barred List Check.

Check TRA prohibited list via the secure access portal (teachers, coaches, peris, TAs).

In January 2021 as the UK had left the EU the TRA teacher system no longer maintained a list of teachers sanctioned in EEA member states. We will however continue to carry out safer recruitment checks on all applicants and for those that have lived or worked outside of the UK we already do checks with the relevant country(ies) they have worked or lived in, so any relevant events that occurred outside the UK can be considered, including obtaining an enhanced DBS certificate with barred list information (even if the teacher has never been to the UK). Teachers may be able to provide proof of their past conduct as a teacher, issued by the professional regulating authority in the country in which they worked, or we can obtain a letter of professional standing.

Prohibition from management checks as per agreed procedures with DBS and TRA so any s.128 directions made by the Secretary of State will show up. This will also be done for Governors.

Check medical questionnaire – anyone appointed who has regular contact with children must possess the appropriate level of physical and mental fitness to confirm an appointment

An online search will be conducted to check for digital presence of the individual, such as social

media profiles or articles in local news of interest, in the location of residence, within the area of the school and nationally.

Check have agreed and signed policies sent with offer letter

All checks listed on Single Central Record

A Risk Assessment Form will be done if the DBS has not come through in time and all other checks are in place. This will be completed by the Line Manager or Supervisor of the member of staff and signed off by the Bursar.. They will be supervised at all times and the risk assessment will be reviewed at least every two weeks until the DBS has come through.

For Agency and contractor staff we ask for written confirmation that all checks have been satisfactorily completed on their employee. We also ask for a photo ID and full name so when they arrive at school we can check their passport and DBS which they are asked to bring to ensure they are the person we are expecting.

The School completes a checklist form to ensure all of the above have been completed and entered on the SCR and this will be put on the individual's HR file once completed.

The successful candidate will be sent details of applying for their DBS certificate online and asked to bring in their certificate when they receive it to be checked by the School, as the School no longer receives a copy. If the new member of staff is registered with the DBS Update Service the School will ask permission to access it to check that there are no concerns so we can validate it for the Single Central Record. If a new employee has lived or worked outside of the UK in the past 5 years there will be additional checks required for a police check in the relevant country.

As well as the prohibition check for teaching staff, an EU directive was introduced (18/01/2016) for a new requirement on the European Economic Area (EEA) authorities, which have responsibility for regulating the teaching profession, to share teacher prohibitions/sanctions with other EEA teacher regulators. Restrictions imposed by another EEA authority do not prevent an individual from taking up teaching positions in England. However the School will consider the circumstances leading up to the restriction when considering a candidate's suitability.

The offer letter sent to the successful candidate will state that recent government legislation (3/9/2018 following consultation on Disqualification by Association) requires that we no longer ask new staff to declare any cautions or convictions of someone living or working in their home. However, we state in the offer letter that there still remains an expectation that staff should inform the school of any relationships or associations (including online) that might have safeguarding implications for the children in the school as per the Disqualification under the Childcare Act (2006).

The Disqualification under the Childcare Act (2006) still applies to those working with Reception age children at any time, and to those working with children from Reception to 8 years of age outside school hours. Relevant staff will be asked to self-declare that they are not disqualified under the Childcare Act (2006). The grounds for disqualification include any offence involving death or injury to a child.

### Central Record of Pre-Employment Checks

In addition to staff records kept on ISAMs and on individual HR files, a Single Central Record of recruitment and vetting checks is kept and held securely in the Bursar's office. This will cover not only contracted staff, but coaches, peripatetic teachers, governors and volunteers working regularly with the children. This is audited by the Safeguarding Governor.



## Induction

All new staff will have sessions with their line manager and the Head to go through the various policies and other information to help them settle into their new role. They are given an induction pack to keep which they are asked to read of a number of key policies. All staff in the School are required to read the Safeguarding (Child Protection) Policy and the Keeping Children Safe in Education document (help is given to those where English is not their first language or they have special educational needs) and all staff sign to say they have done this. All staff attend Safeguarding (Child Protection) training annually.

Staff all have a six month probation period in their contracts and they will have regular meetings with their Line Manager, to ensure that they have full support and information regarding the School's policies and procedures. It also enables both parties to raise any areas of concern. These meetings will be documented to ensure that the new employee has settled into their new role and environment and are fulfilling the requirements of the role and are suitable for the post. The meetings provide support to the new employee in settling into the School and can assist with training or other resources if required.

## Peripatetic Teachers/Coaches/Supply Staff/Volunteers

Peripatetic teachers and Coaches are all provided with agreements stating clearly the terms and conditions by which they must work here and regulations they must adhere to. As with other staff all ID, DBS and reference checks are done as they will also be done for volunteers.

Where staff are supplied by an agency or contractors they have to provide written details prior to their worker arriving and they have to send us notification that all checks have been made.

## Retention of Records

When an applicant is appointed, the school will retain any relevant information provided on their HR file. If an applicant has been unsuccessful, all documentation relating to them will be kept securely for 6 months in accordance with the GDPR (2018) and Data Protection Act (1998) and then shredded by the School unless the applicant asks the school to keep their information for longer.

## Ongoing Employment

The School recognises that safer recruitment is not just about the selection and appointment process, but forms part of a wider brief as part of our Safeguarding (Child Protection) procedures. If subsequent to an appointment concerns or allegations are raised, e.g. through but not limited to our Complaints Policy or Whistleblowing Policy, and concern children's welfare then the Head will follow procedures as per that policy in regard to reporting these.

The School also recognises that it is an offence if the School does not inform the DBS when anyone working in the School (employed, contracted, supply, agency, volunteer) in regulated activity, is dismissed or resigns due to safeguarding concerns. The referral criteria is met when a person has caused harm or posed a risk of harm to a child.

The School is aware of its legal responsibility and will refer. As an Independent School we are also under a duty to consider referring a teacher to the Teaching Regulation Agency (TRA) and a prohibition order may be appropriate. The TRA provides guidance about referrals on their website.

This policy is designed to work in conjunction with our Safeguarding (Child Protection) Policy as part of our culture of support and commitment to the welfare of the children and staff working in

the School. Other policies linked to this ethos and to support staff both new and existing are the Whistleblowing Policy, Staff Code of Conduct Policy, and Visitors Policy, which ensures that visitors are suitably supervised and cared for whilst in the School.

The School ensures through induction and training that our staff know that we have an open and safe culture where all concerns can be voiced without fear of retribution and will be properly looked at and investigated.



## APPENDIX

### Policy Statement On The Recruitment Of Ex-Offenders

The code of practice published under section 122 of the Police Act 1997 advises that it is a requirement that all registered bodies must treat DBS applicants who have a criminal record fairly and not discriminate automatically because of a conviction or other information revealed. St. Christopher's the Hall complies with this code of practice and is committed to treating every applicant fairly.

As an organisation, St Christopher's, (the School) assesses applicants' suitability for positions of trust which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 175 as amended and where appropriate Police Act Regulations as amended using criminal record checks processed through the Disclosure and Barring Service (DBS). the School complies fully with the DBS code of practice and undertakes to treat all applicants for positions fairly. The School undertakes not to discriminate unfairly against any subject of a disclosure on the basis of a conviction or other information revealed.

As per its Safer Recruitment Policy and ethos of Equal Opportunities, the School is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion or belief, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

The School actively promotes the equality of opportunity for all with the right mix of talent, skills and potential and welcomes applications from a wide range of candidates, including those with criminal records.

The School selects all candidates for interview based on their skills, qualifications and experience.

The School's job adverts, application forms and Safer Recruitment Policy all have a statement that an application for a DBS certificate will be required in the event of an individual being offered the position.

Where a disclosure is to form part of the recruitment process, the School encourages all applicants shortlisted for interview to provide details of convictions or cautions that we are legally entitled to know about at an early stage in our application process. This information will be sent or given under separate, confidential cover to the School for the designated person at the School, who will guarantee that this information will only be seen by those who need to see it as part of the recruitment process. The School can only ask an individual to provide details of convictions and cautions that they are legally entitled to know about.

The School ensures that all those in the School who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. The School also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders e.g the Rehabilitation of Offenders Act 1974.

At an interview, or in a separate discussion, the School ensures that an open and measured discussion takes place on the subject of any offences or other matters that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

The School will make all staff who we submit a DBS check for, aware of the existence of the Home Office code of practice for the DBS and it will be put on the vacancy information along with this policy, Safer Recruitment and the other job details.

Having a criminal record will not necessarily bar you from working at the School, but this will depend on the nature of the position and the circumstances and background of your offence(s).

This written policy statement on the recruitment of ex-offenders will be made available to all disclosure applicants at the outset of the recruitment process.