ST EDMUND'S SCHOOL
CANTERBURY

Recruitment, Selection and Disclosure Policy

THIS POLICY SHOULD BE READ IN CONJUNCTION WITH THE SCHOOL SAFEGUARDING POLICY AND KEEPING CHILDREN SAFE IN EDUCATION 2026.

THESE CAN BE FOUND ON THE SCHOOL WEBSITE HERE:

https://www.stedmunds.org.uk/about-us/policies-inspection-reports/

1. Introduction

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

This policy should be read in conjunction with the School Safeguarding Policy, Keeping Children Safe in Education (KCSIE 2026), and relevant ISI regulatory requirements.

The aims of the school's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including age, disability gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation (Protected Characteristics);
- To ensure internal applicants have equal opportunity to apply for job vacancies;
- 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 (KCSIE 2026), Disqualification Under the Childcare Act 2006 (DUCA) and any guidance or code of practice published by the Disclosure and Barring Service (DBS);
- to ensure that the school meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

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

The definition of staff is any person working at the school whether:
- under a contract of employment
- under a contract for services, including self-employed people arranged and/or paid direct by the school
- or otherwise than under a contract, including self-employed people who are arranged by the school for the purposes of the school but who, for example, are paid direct by parents. This doesn't include private employees of parents permitted to enter the school by agreement (the term private employees refers to employees of parents such as nannies and excludes private tutors or private music teachers employed by parents using the School site who are included as 'staff').

2. Recruitment and selection procedure

- All applicants for employment will be required to complete a staff application form containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. The School will only accept copies of a curriculum vitae alongside an application form as per KCSIE 2026 para 295.
- Applicants will receive a job description (which will include a person specification) for the role applied for.
- The School's Safeguarding Policy is available to download from the school's website and can be printed and forwarded to applicants on request.

Pre-employment checks will be made of candidates after shortlisting. These checks will be made by the HR team.

The applicant may then be invited to attend a formal interview.

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

The school will always seek to obtain reference prior to interview in accordance with KCSIE (2026) para 302:

"Schools and colleges should obtain references before interview, where possible, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview."

Interviews will be conducted in person and the areas which it will explore will include:.
- finding out what attracted the candidate to the post being applied for and their motivation for working with children,

- exploring their skills and asking for examples of experience of working with children which are relevant to the role, and;
- probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.
- suitability to work with children

At least one of the staff interviewers involved in the recruitment and selection procedure will be safer recruitment trained.

Pupils are involved in the recruitment process for academic leadership and teaching positions in a meaningful way, such as Lesson Observation feedback and School Council interviews.

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks, which includethe following:

- verification of the applicant's identity (where that has not previously been verified);
- the receipt of **at least two written references** (one of which must be from the applicant's most recent employer) which the school considers to be satisfactory and a phone call to verify the identity of those who have supplied references;
- for teaching positions and all roles engaged to carry out teaching work in the School, confirmation through the DfE Check a teacher's record that the applicant is not subject to a prohibition order;
- where the position amounts to "regulated activity (see section 4.3 below) the receipt of an enhanced disclosure from the DBS which the school considers to be satisfactory;
- where the position amounts to "regulated activity" (see section 4.3 below) confirmation that the applicant is not named on the Children's Barred List*;
- confirmation that the applicant does not commence work in contravention of a direction under section 142 of the Education Act 2002 or section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from teaching or being involved in the management of an independent school;
- confirmation that the applicant is not disqualified from working in connection with early or later years provision (see section 5 below);
- verification of the applicant's mental and physical fitness for the role (see section 3 below); and
- verification of the applicant's right to work in the UK;
- completion of a satisfactory check of the applicants online presence and activity. This is carried out by the HR Department using open-source searches (e.g. professional networking sites, social media). A written record of the check is retained on the single central register (SCR)
- verification of all relevant professional qualifications
- any further checks which are necessary as a result of the applicant having lived or worked outside of the UK; and verification of professional qualifications which the school deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified). See Paragraph 4.4 below.

In addition:
- for those applicants taking up a management position, verify they are not subject to a section 128 direction made by the Secretary of State
- all applicants to carry out teaching work, verification they are not subject to a prohibition order issued by the Secretary of State

*The DfE Keeping Children Safe in Education (2026) states that a school must obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children)

The school adheres to Standard 14 of the National Minimum Standards in relation to those staff who care for, train, supervise or are in charge of boarders.

3 Medical fitness

The school is legally required to verify the medical fitness (mental and physical) of anyone to be appointed to a post at the school, after an offer of employment has been made but before the appointment can be confirmed.

Successful applicants will be required to sign a declaration of medical fitness confirming that there are no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the role. The school may also seek a medical opinion from an Occupational Health specialist or request that the applicant undertakes a full medical assessment.

If an applicant prefers to discuss their fitness for the role with the school instead, or to attend an occupational health assessment to consider their fitness for the role, they should contact the Head of HR so that appropriate arrangements can be made.

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

4. Pre-employment checks

In accordance with the recommendations set out in the Guidance, KCSIE (2026), DUCA and the requirements of The Education (Independent School Standards) Regulations 2019 the school carries out a number of pre-employment checks in respect of all prospective employees. (See Appendix 2).

4.1 Verification of identity and address

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

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

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

The school asks for the date of birth of all applicants (and proof of this) in accordance with the

Guidance and KCSIE 2026. Proof of date of birth is necessary so that the school may verify the identity of, and check for any unexplained discrepancies in the employment and education history of all applicants. The school does not discriminate on the grounds of age.

4.2 References

The School shall request references for short-listed candidates prior to interview unless there is a good reason not to (which include applicants informing the Head or Head of HR they do not wish a referee to be contacted at this stage and the reason for this).

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

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 or young people.

If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title / duties, reason for leaving, performance, sickness and disciplinary record;
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children or young people (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be false, unsubstantiated, or malicious;
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people, except where the allegation or concerns were found to be false, unsubstantiated, or malicious.

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

The school will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed. The Bursar will follow up references with a phone call to verify identity.

Applicants should be aware that provision of false information is an offence and could result in their application being rejected or summary dismissal if the applicant has been selected and possible referral to the police and /or DfE Children's Safeguarding Operation Unit.

4.3 Criminal records check

The DfE Keeping Children Safe in Education (2026) states that a school 'must obtain via the applicant' an enhanced DBS check (including the Children's Barred List) for those who will be engaging in regulated activity with children.

Prior to 29 May 2013 an enhanced disclosure contained details of all convictions on record (including those which are defined as "spent" under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. It could also contain non-conviction information from local police records which a chief police officer considered relevant to the role applied for at the school.

As of 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The DBS and the Home Office have developed a set of filtering rules relating to spent convictions which work as follows:

For those aged 18 or over at the time of an offence
An adult conviction will be removed from a DBS disclosure if:

- eleven years have elapsed since the date of conviction;
- it is the person's only offence;
- it did not result in a custodial sentence.

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

A caution received when a person was aged 18 or over will not be disclosed if six years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

For those aged under 18 at the time of an offence
A conviction will be removed from a DBS disclosure if:

- five and a half years have elapsed since the date of conviction;
- it is the person's only offence;
- it did not result in a custodial sentence.

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

A caution received when a person was aged under 18 will not be disclosed if two years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

The list of "specified offences" which must always be disclosed

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

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

The school applies for an enhanced disclosure from the DBS and a check of the Children's Barred List

(now known as an Enhanced Check for Regulated Activity) in respect of all positions at the school which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information.

Any position undertaken at, or on behalf of, the school (whether paid or unpaid), will amount to "regulated activity" if it is carried out:

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

Specifically, the definition of “regulated activity” also includes:

- teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- work for a limited range of establishments (known as ‘specified places’, which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.
- Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes: relevant personal care, or health care provided by or provided under the supervision of a health care professional: • personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness of disability;
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional

It is for the school to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances and whether a role whilst not regulated activity will provide access to children, therefore requiring a DBS as a precaution. However, nearly all posts at the school amount to regulated activity. It is the school's policy to carry out both an enhanced DBS check and a check of the Children's Barred List on all applicants who are appointed to work in regulated activity.

The DBS issues a DBS disclosure certificate to the subject of the check, whilst the school receives an e-copy (unless the disclosure is unsatisfactory); in which case the school is advised to approach the applicant to request that the original disclosure certificate is provided to the school within one week of it being received by the applicant. Original certificates should not be sent by post. Applicants must instead bring the original certificate to the HR team. Applicants who are unable to attend at the school to provide the certificate are required to send in a certified copy by post or email. Certified copies must be sent to the HR team. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the school.

If there is a delay in receiving a DBS disclosure the Head has discretion to allow an individual to begin work pending receipt of the disclosure and a risk assessment will be carried out. This will only be allowedif all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once appropriate supervision has been put in place. The exception is those applicants work in EYFS as the School is required to receive the

applicant's enhanced DBS certificate including barred list information prior to the employment start date (KCSIE 2026 340-341)

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants may also be asked to provide further information, including a criminal records check from the relevant jurisdiction(s).

Where an applicant has subscribed to the update service, the School will request the original certificate to run an online update check via the DBS Update Service to check for changes since the certificate has been issued. If the check indicates a change then an application will be made for a new certificate. If the original check did not include barring information for the children's workforce a separate barred list check must be obtained.

4.4 European Economic Area Checks:

From 1st January 2021 (following BREXIT) the TRA Teachers Services system stopped maintaining a list of those teachers who have been sanctioned in European Economic Area member states. The school therefore follows the procedures outlined in KCSIE 2026 to ensure that individuals who have lived outside the UK undergo the same pre-appointment checks as all other staff at the school. These are contained in Paragraphs 359-363 of KCSIE 2026. The requirements include obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) and where available criminal records checks for overseas applicants and obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked.

5 Childcare disqualification requirements

In accordance with KCSIE (2026) para 342-346, St Edmund's recognises that "childcare disqualification is an additional requirement to the general child safeguarding arrangements provided under the Disclosure and Barring Service (DBS) regime, which apply to all children."

The Childcare Act 2006, the Childcare (Disqualification) Regulations 2009 and Keeping Children Safe in Education (2026) state that it is an offence for the school to employ anyone in connection with our early years or later years provisions with children up to the age of eight who is disqualified. This applies to normal school activities and any before or after school clubs or activities. It is also a criminal offence for a disqualified person to provide early or later years provision or to be directly concerned in its management. School governors, volunteers and support staff are not covered by the legislation unless they already work or volunteer in a relevant position.

The Childcare (Disqualification) Regulations and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 removed the 'Disqualification by association' requirement from schools and registered non-domestic childcare settings. St Edmund's School recognizes its continuing responsibility to ensure that staff and volunteers who work in or manage early years childcare and 'wrap-around' care for under 8s are not personally disqualified – but will no longer extend its enquiries to those who live and work in their households.

Therefore, in accordance with Childcare (Disqualification) Regulations and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, the grounds for disqualification are not only that a person is barred from working with children (ie. included on the DBS children's barred list) but also include that:

(i) They have been cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad.

(ii) Other orders have made against them relating to the care of children.

Disqualification occurs as soon as the above criteria are met, for example, as soon as a caution or conviction occurs, even before the person is formally included on the children's barred list. The DfE has advised that relevant convictions are not considered 'spent' in this connection.

As a school we take great pride in the pastoral care we provide and it could be necessary for any staff to be available to support our children in the Junior and the Pre Prep Schools. If applicable the school can ask all job applicants who are invited for interview to complete the Self-Declaration section of the application form confirming whether they meet any of the criteria for disqualification. The school will consider any information disclosed before deciding whether to proceed with an interview. The school reserves the right to reject the application of any person who is disqualified from working in connection with early or later years' provision. An interview may not proceed if the school has not received a completed Self-Declaration in advance.

After making this declaration staff are under an on-going duty to inform the school if their circumstances change in a way which would mean they subsequently meet any of the criteria for disqualification. Staff are informed, through continuous training and the school's central safeguarding policy, that it is their responsibility to disclose any convictions, court orders and reprimands and warnings which may affect their suitability to work with children, and the school makes them aware that they should update any information regarding their suitability to work with children if their situation changes. Any failure to disclose relevant information now, or a future change in circumstances, will be treated as a serious disciplinary matter and may lead to the withdrawal of a job offer or dismissal for gross misconduct.

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

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

A person who discloses information which appears to disqualify them from working in early or later years provision may apply to Ofsted for a waiver of the disqualification. However, the school cannot appoint any person who is currently disqualified.

6. Contractors and agency staff

Contractors engaged by the school must have the required employment checks in place as all staff and in accordance with KCSIE 2026 para 364 and ISI 'Checks on people working in Schools' (appendix 3) The school requires confirmation that these checks have been completed before employees of the Contractor can commence work at the school. The school (via the Estates Manager and Bursar) requires written confirmation from the employer that the appropriate checks are in place and identity checks are made on all members of staff on their arrival at the school.

Agencies who supply staff to the school must also complete the pre-employment checks which the school would otherwise complete for its staff. Again, the school requires confirmation that these

checks have been completed before an individual can commence work at the school. The school will independently verify the identity of staff supplied by contractors or an agency in accordance with section 4.1 above and view their enhanced criminal record certificate on their arrival at the school.

7. Governors and Trustees

As Trustees of a registered charity, the Governors of the School are responsible for the selection and appointment of new Governors. This is a legal responsibility that cannot be delegated. The School will not appoint or retain trustees who are disqualified from being a trustee, unless the Charity Commission has given a waiver. All potential trustees should complete a charity trustee positions: automatic disqualification declaration before beginning the selection process.

Following return of the completed disqualification declaration, all Governors complete a selection process, which requires the submission of a CV and completion of an interview with the Nominations Committee and a meeting with the Head. Every Governor has an enhanced DBS check unless they will be undertaking a regulated activity, in which case they will they will undertake an enhanced DBS check with a barred list check. Each appointment is made by the full Board in line with the School's Memorandum and Articles of Association. The School arranges for all new Governors to receive a through induction in child protection and in the compliance and fiduciary duties of governance. New Governors spend time at the School in order to meet the key personalities and to gain an insight into the curriculum and to meet groups of pupils.

The Bursar (in his/her role as Clerk to Governors) at the School will obtain the following from the new potential governor before their appointment is confirmed:

- an enhanced DBS certificate;
- if the Governor will be undertaking a regulated activity, a barred list check;
- evidence of their entitlement to work in the UK, where relevant;
- confirmation that they are not disqualified from acting as a Charity Trustee or Company Director, for example by virtue of an undischarged bankruptcy;
- evidence that the Governor has not been prohibited from participating in the management of independent schools;
- a declaration that they are not disqualified from providing childcare as set out in the statutory

All the paperwork is handled by the Bursar/Clerk to the Governors.

If the Proprietor or Chairman of Governors, is to change, the school will ensure that the DfE obtains an enhanced criminal records check counter-signed by the 'Secretary of State', and checks both the individual's identity and right to work in the UK before he or she takes up the appointment. Further overseas checks are required if the person lives or has lived outside the UK. The Chairman's disclosure application has to be made by the DfE; the school cannot handle it as they would for all other Governors. So, even if a Governor, whom the school has already checked, becomes Chairman, the DfE has to make yet another check.

8. Work Experience and Gap-Year Students

The School recognises its responsibility to safeguard children where work experience students (including those aged 16–18) or gap-year assistants are placed. All individuals are subject to appropriate checks and supervision in accordance with KCSIE 2026 and ISI Commentary on Regulation.

9. Volunteers

Volunteers in regulated activity are subject to the same safer recruitment principles as staff.

The Crime and Policing Act 2026 made changes to regulated activity, meaning that any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight is now in regulated activity.Volunteers not in regulated activity will under no circumstances, where no checks, have been obtained be left unsupervised or allowed to work in regulated activity. A risk assessment will be undertaken for all volunteers not in regulated activity in accordance to KCSIE 2026 300-389.

9. Visiting Speakers

Any visiting speakers, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised. St Edmund's recognises that The Counter-Terrorism and Security Act 2015, places a legal responsibility on schools to take every effort to prevent individuals from being drawn into terrorism. This duty extends to ensuring that reasonable background checks have been carried out. The School's DSL is also Prevent Lead and undertakes regular training in this regard, such as the Channel online course. The role of the Prevent lead includes ensuring staff awareness and providing advice to colleagues making arrangements to bring visiting speakers into school.

9. Policy on recruitment of ex-offenders

9.1 Background

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. If an applicant has a criminal record this will not automatically bar him / her from employment within the school. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph 6.2 below.

All positions within the school are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except for those to which the DBS filtering rules apply (see paragraph 4.3 above). A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for the school to employ anyone who is barred from working with children. It is a criminal offence for any person 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;
- it has serious concerns about an applicant's suitability to work with children.

9.2 Assessment criteria

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

- whether the conviction or other matter 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;
- 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 school's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any 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 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.

9.3 Assessment procedure

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

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

9.4 Retention and security of disclosure information

The school's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information, but is under no obligation to do so.

In particular, the school will:

- store disclosure information and other confidential documents issued by the DBS in secure electronic files access to which will be restricted to members of the school's senior management team and HR Department;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months. The school will keep a record of the date of a 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;
- ensure that any disclosure information is destroyed by suitably secure means such as shredding;
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

10. Retention of records

The School maintains a Single Central Record (SCR) in line with the Education (Independent School Standards) Regulations 2019. The SCR records the following for all staff, supply staff, contractors, volunteers, and governors:

- Identity verification
- Barred list check (where applicable)
- Enhanced DBS disclosure
- Prohibition from teaching checks
- Prohibition from management (s.128) checks (where applicable)
- Right to work in the UK
- Qualifications (where required)
- Overseas checks
- Medical Check
- Online Check

The SCR is reviewed termly by the Safeguarding Governor.

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 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. 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.

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 six months after employment terminates after which it will be securely destroyed.

If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.

11. Referrals to the DBS and Teaching Regulation Agency (TRA)

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 the school also has a legal duty to make a referral to the DBS in circumstances where an individual:-

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

If the individual referred to the DBS is a teacher, the school may also decide to make a referral to the TRA.

12. Queries

If an applicant has any queries on how to complete the application form or any other matter relating to the school's recruitment process he / she should contact the Head of HR.

13. Review of Policy

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

This policy is reviewed annually by the Governing Body, the Designated Safeguarding Lead, the Head of HR and the Head. The review is formally recorded in Governing Body minutes and updated versions are issued with clear version control.

EOC/SLH

V1 September 2018

V2 September 2019

V3 September 2020

V4 September 2021

V5 February 2022

V6 September 2022

V7 September 2023

V8 September 2024

V9 September 2025

V10 September 2026

Review Date: September 2027

Appendix 1 DISCLOSURE AND BARRING SERVICE (DBS) CHECKS

List of Valid Identity Documents (originals only - photocopies, certified copies or on-line printed documents are not acceptable)

- 1 document from Table 1 (below) and
- 2 other documents from either Table 1 or Table 2a or 2b (below)
- At least one of the documents must show the applicant's current address.

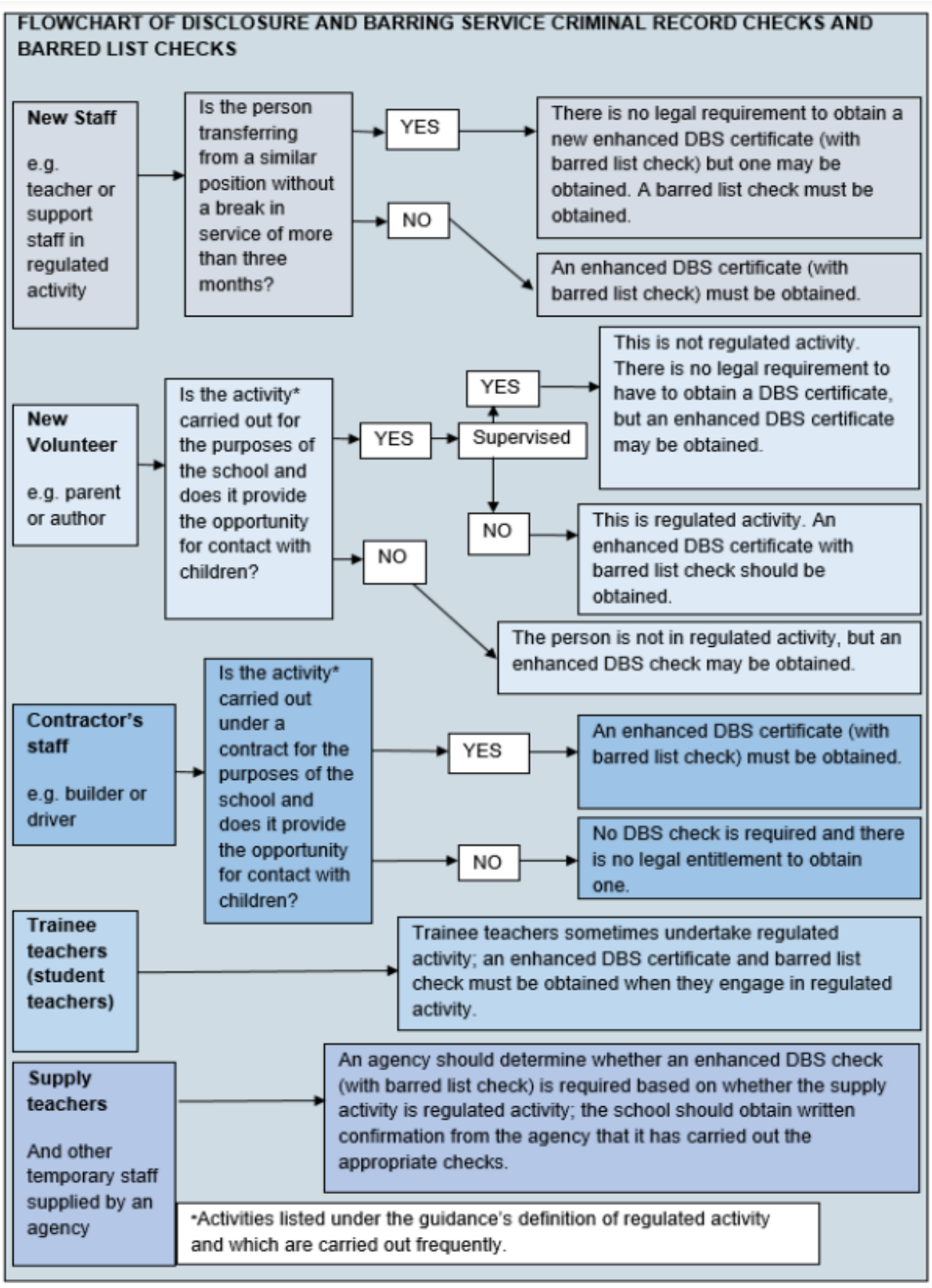
Table 1: **Primary identity documents**	***Notes***
Passport	A current valid passport (any Nationality)
Biometric residence permit	UK
Current driving licence – photocard with counterpart where one is issued	UK/Isle of Man/Channel Islands and EU (full or provisional) (Please note some European countries do not issue counterparts). All licences must be valid in line with current DVLA requirements
Birth certificate – issued within12 months from date of birth	UK and Channel Islands and UK authorities overseas, i.e. Embassy or HM Forces
Adoption Certificate	UK and Channel Islands

Table 2a: trusted government/state issued documents
Current UK driving licence (old style paper version)
Current non-UK driving licence (valid from up to 12 months from the date the applicant entered the UK
Birth certificate (UK and Channel Islands) – issued at any time after the date of birth by the General Registrar Office / relevant authority i.e. Registrars)
Marriage / civil partnership certificate (UK and Channel Islands)
Adoption certificate (UK and Channel Islands)
HM Forces ID card (UK)
Fire arms licence (UK and Channel Islands)

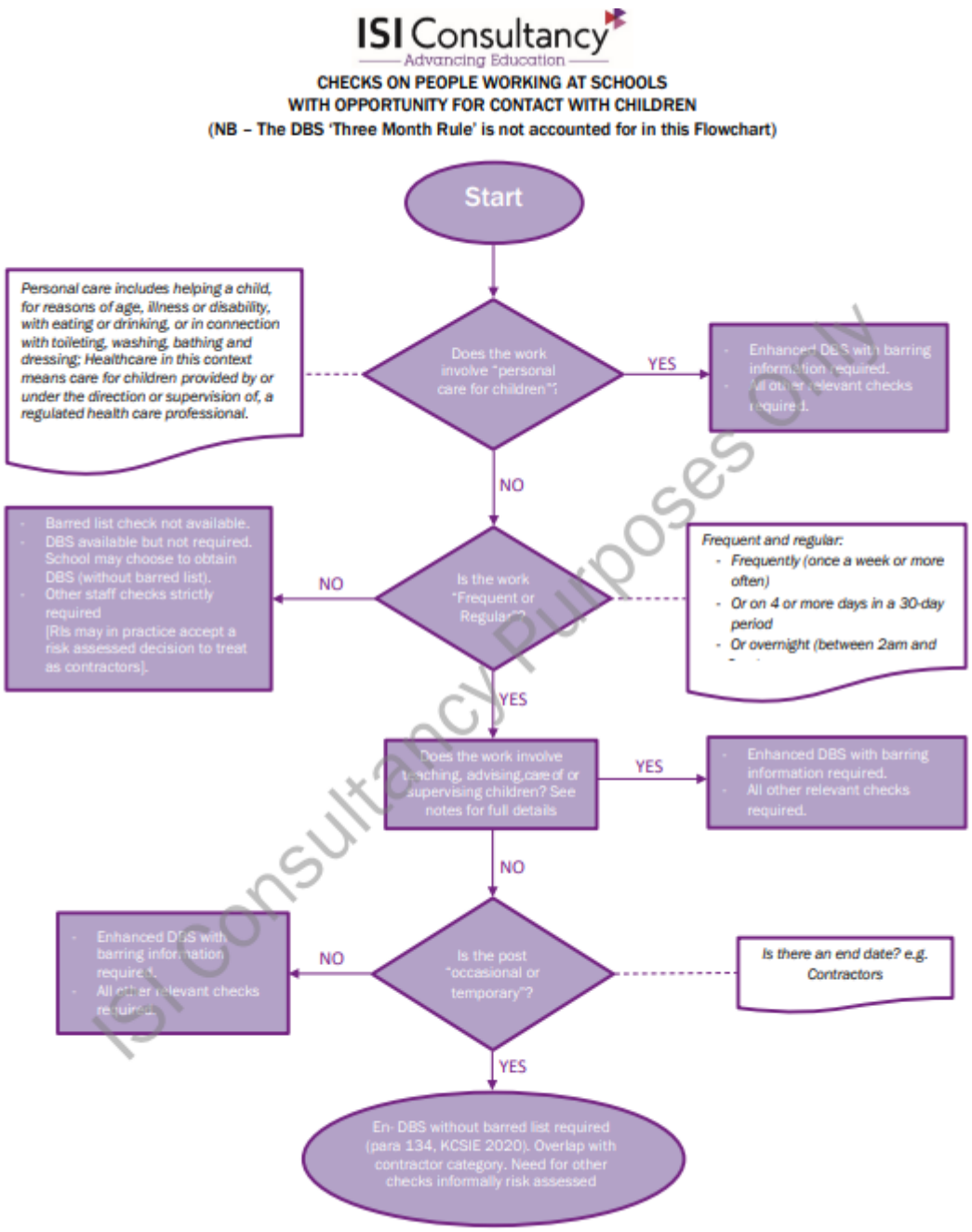
Table 2b: Financial / social history documents
Mortgage statement (UK)**
Bank / building society statement (UK and Channel Islands)*
Bank / building society account opening confirmation letter (UK)
Credit card statement (UK)*
Financial statement** e.g. pension, endowment, ISA (UK)
P45 / P60 statement** (UK and Channel Islands)
Council tax statement (UK and Channel Islands)
Work permit / visa (UK) (UK Residence Permit)**
Letter of sponsorship from future employment provider (non UK / non only valid for applicants residing outside the UK at the time of application)
Utility bill (UK) * - not mobile telephone
Benefit statement – e.g. child benefit, pension
A document from central / local government / government agency / local authority giving entitlement (UK and Channel Islands)* - e.g. from the Department for Work and Pensions (DWP), the Employment Service, HM Revenue & Customs (HMRC), Job Centre, Job Centre Plus, Social Security
EU national ID card
Cards carrying the PASS accreditation logo (UK)
Letter from Head or College Principal (UK) for 16-19 year olds in full time education. This is only used in exceptional circumstances if other documents cannot be provided.

Note
If a document in the list of valid identity documents is: Denoted with * - it should be less than three months old Denoted with ** - it should be less than 12 months old Not denoted – it can be more than 12 months old

Appendix 2


FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS
New Staff
e.g. teacher or support staff in regulated activity
Is the person transferring from a similar position without a break in service of more than three months?
YES
There is no legal requirement to obtain a new enhanced DBS certificate (with barred list check) but one may be obtained. A barred list check must be obtained.
NO
An enhanced DBS certificate (with barred list check) must be obtained.
New Volunteer
e.g. parent or author
Is the activity* carried out for the purposes of the school and does it provide the opportunity for contact with children?
YES
Supervised
YES
This is not regulated activity. There is no legal requirement to have to obtain a DBS certificate, but an enhanced DBS certificate may be obtained.
NO
This is regulated activity. An enhanced DBS certificate with barred list check should be obtained.
NO
The person is not in regulated activity, but an enhanced DBS check may be obtained.
Contractor's staff
e.g. builder or driver
Is the activity* carried out under a contract for the purposes of the school and does it provide the opportunity for contact with children?
YES
An enhanced DBS certificate (with barred list check) must be obtained.
NO
No DBS check is required and there is no legal entitlement to obtain one.
Trainee teachers (student teachers)
Trainee teachers sometimes undertake regulated activity; an enhanced DBS certificate and barred list check must be obtained when they engage in regulated activity.
Supply teachers
And other temporary staff supplied by an agency
An agency should determine whether an enhanced DBS check (with barred list check) is required based on whether the supply activity is regulated activity; the school should obtain written confirmation from the agency that it has carried out the appropriate checks.
*Activities listed under the guidance's definition of regulated activity and which are carried out frequently.

Appendix 3



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