



Recruitment Policy



2024-2025

Approved by: Headteacher

Date: September 2024

Last reviewed on: September 2024

Next review due by: September 2025

Recruitment and selection process

To ensure we recruit suitable people, we will ensure that those involved in recruiting and employing staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That 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
- 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

Application forms

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)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share

relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information

· Sign a declaration confirming the information they have provided is true

We will also consider carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we will carry out these checks as part of our due diligence process.

Seeking references and checking employment history

Where possible, we will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we 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

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We 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.

New staff

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, 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 may still keep a record of the fact that vetting took place, the result of the check and 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

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

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 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.

Regulated activity means a person who will be:

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

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the

[Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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 on whom the checks have been made. Currently, HPS does not employ any agency/third-party staff.

Contractors

We 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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

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 fall 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. Currently, HPS does not employ any contactors.

Trainee/student teachers

HPS does not have any trainee teachers who are salaried by us.

Volunteers

We will:

- : Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity*
- : Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity*
- : Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment*
- : 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*

Governors and Directors

There are no governors at HPS. The directors receive all appropriate checks.

Adults who supervise pupils on work experience

HPS do not have any adults who supervise work experience.

Pupils staying with host families

HPS does not have any pupils staying with host families.

Records

At Hale Prep, Mrs R Vayro has responsibility for the Single Central Register. All personnel records are kept on the shared drive-in staff folders. All documents are scanned in.

Administrative Procedures

All staff personnel records are stored under secure conditions, with access restricted to those needing to view them. The central point for all DBS matters, including keeping records, is Mrs R Vayro. DBS checks are part of a recruitment checklist for all employees. The headteacher will decide how to proceed where a trace (conviction or caution) is revealed. Legal advice may be necessary to ensure the response is correct and appropriate. The headteacher will keep a confidential record of all discussions for inclusion in the personnel file. The headmaster will also attach a brief written rationale for action and decisions taken to the file.

Mrs R Vayro is fully trained in safer recruitment. On the 2nd February 2022, Kath Busby, Kirsty Leyland, and Belinda Wilson attended the training: Single Central Register – Getting it Right ISA run by Elizabeth Coley.

In Jan 2024 Belinda Wilson and Kirsty Leyland complete safer recruitment training run by the NSPCC.

Peripatetic Staff and Visitors

All staff from organisations and services supporting the school and pupils' learning or welfare must have a current, appropriate DBS/CRB Disclosure. Where this is not the case, an individual would never be left unaccompanied in the school, and a Risk Assessment would be put in place.

Recruiting Ex-Offenders

Each application must be judged on its merits. The policy on recruitment of ex-offenders is included in Annex 1.

Audit Requirements

The DBS undertakes assurance visits, as does the Independent Schools Inspectorate regarding compliance. Personnel files will be periodically sample tested by the deputy's head to check that there is a record receipt of a satisfactory DBS check. Where the counter-signatory has received notice of a caution or conviction being revealed, the personnel file must show

evidence of this contact and a brief outline of the headteacher's decision and any action taken.

For all new appointments in regulated activity, the following will be checked:

<u>NAME:</u>		
<u>ROLE</u>	<u>START DATE:</u>	
<u>Checks to be undertaken</u>	<u>Date seen/received</u>	<u>Signed off</u>
INFORMATION REQUIRED AT THE INTERVIEW		
Application form		
Identity – picture ID name Passport		
ID – DOB – birth certificate, if possible		
ID – address (within three months)		
Qualifications		
Right to work in the UK (passport)		
Reference 1 – date sent for: <i>Obtain, where possible, before the</i>		
Reference 2 – date sent for: <i>Obtain, where possible, before the</i>		
<i>If reference from a current employer is not possible, obtain character ref with specific reference to suitability re working with children.</i>		
DBS Enhanced disclosure (if the applicant doesn't have a valid DBS, date sent for and date received)	DBS applied for	received
Children's Barred List		
Medical fitness – <i>only request after an offer of a job</i>		
Online Check		

<i>Prohibition from teaching</i>		
<i>Prohibition from management</i>		
<i>Overseas check/letter from professional regulating authority – date sent for:</i>		
<i>Disqualification self-declaration</i>		
<i>Written evidence of job offer</i>		
<i>Final sign-off by the Head</i>		

The grounds for disqualification include, in summary:

- being on the DBS Children’s Barred List;*
- being cautioned for, convicted of, or charged with certain violent and sexual criminal offences against children and adults, at home or abroad;*
- being the subject of certain other orders relating to the care of children;*
- refusal or cancellation of registration relating to childcare or children’s homes or being prohibited from private fostering;*
- A separate barred list check will be undertaken if:*
 - A new enhanced disclosure with barring information is required but is not received in advance of a member of staff starting the regulated activity.*
 - A pre-existing enhanced DBS check is accepted under the 3-month rule.*
 - A pre-existing enhanced DBS check without barring information is accepted from a candidate who has subscribed to the DBS update service.*

In each of these three situations, the checks set out in KCSIE, paragraph 229 must have been carried out, i.e., identity, mental and physical fitness, right to work in the UK, appropriate further checks if the person has lived or worked outside of the UK, professional qualifications as appropriate, prohibition from management where appropriate and disqualification from childcare where appropriate.

Disqualification occurs when the above criteria are met, for example, when a caution or conviction occurs, even before the person is formally included on the children's barred list.

The information is also kept centrally on the Single Central Register, with copies of documents in staff folders kept confidentially

By definition, a disqualified person cannot lawfully do the work they are disqualified. If a person is found to be disqualified, including by association, or if there is doubt over that issue, then pending resolution, they will be removed from the work from which they are or maybe disqualified. If an individual is found to be disqualified, subject to assessing the risks and taking advice from the LADO, there is scope in principle to redeploy them with other age groups.

If a staff member falls within one of the disqualification criteria, the headteacher will inform Ofsted. The headteacher will then inform the staff that they can apply to Ofsted for a waiver of disqualification (including by association) unless they are barred from working with children.

Appendix 1 – Policy on Recruitment of Ex-Offenders

Introduction

As an organisation using the Disclosure and Barring Service (DBS) to assess applicants' suitability for positions of trust, Hale Prep School complies fully with the DBS Code of Practice. It undertakes to treat all applicants for positions fairly. It does not discriminate unfairly against any subject of a Disclosure based on conviction or other information revealed.

Hale Prep School is committed to the fair treatment of its staff, potential staff, or users of its services, regardless of race, gender, sexual orientation, responsibilities for dependents, age, physical/mental disability, or offending background.

We have a written policy on recruiting ex-offenders, made available to all Disclosure applicants at the outset of the recruitment process.

We actively promote equality of opportunity for all with the right mix of talent, skills, and potential. We also welcome applicants from various candidates, including those with criminal records. We select all interview candidates based on their skills, qualifications, and experience.

Disclosure

Shortlisted candidates (NOT those who do not make the shortlist) will be asked to complete a self-declaration of their criminal record that would make them unsuitable to work with children.

Unless the nature of the position allows Hale Prep School to ask questions about their entire criminal record, we will only ask about 'spent' convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those in Hale Prep School involved in the recruitment process have been trained to identify and assess the relevance and circumstances of offences. We also ensure they have received appropriate guidance in the relevant legislation relating to ex-offenders' employment, e.g., the Rehabilitation of Offenders Act 1974.

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

We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

Appendix 2 – Policy on Secure Storage, Handling, Use, Retention, and Disposal of Disclosures and Disclosure Information

Introduction

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust; Hale Prep School complies fully with the Code of Practice regarding the correct handling, use, storage, retention, and disposal of Disclosure certificates and information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation about the safe handling, use, storage, retention, and disposal of disclosure information and has a written policy on these matters are available to those who wish to see it on request.

Storage and access

Disclosure information is never kept on an applicant's personnel file. It is always kept separately and securely in a lockable, non-portable storage container with access strictly controlled and limited to those entitled to see it as part of their duties.

Handling

By section 124 of the Police Act 1977, Disclosure information is only passed to those authorised to receive it during their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed, and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

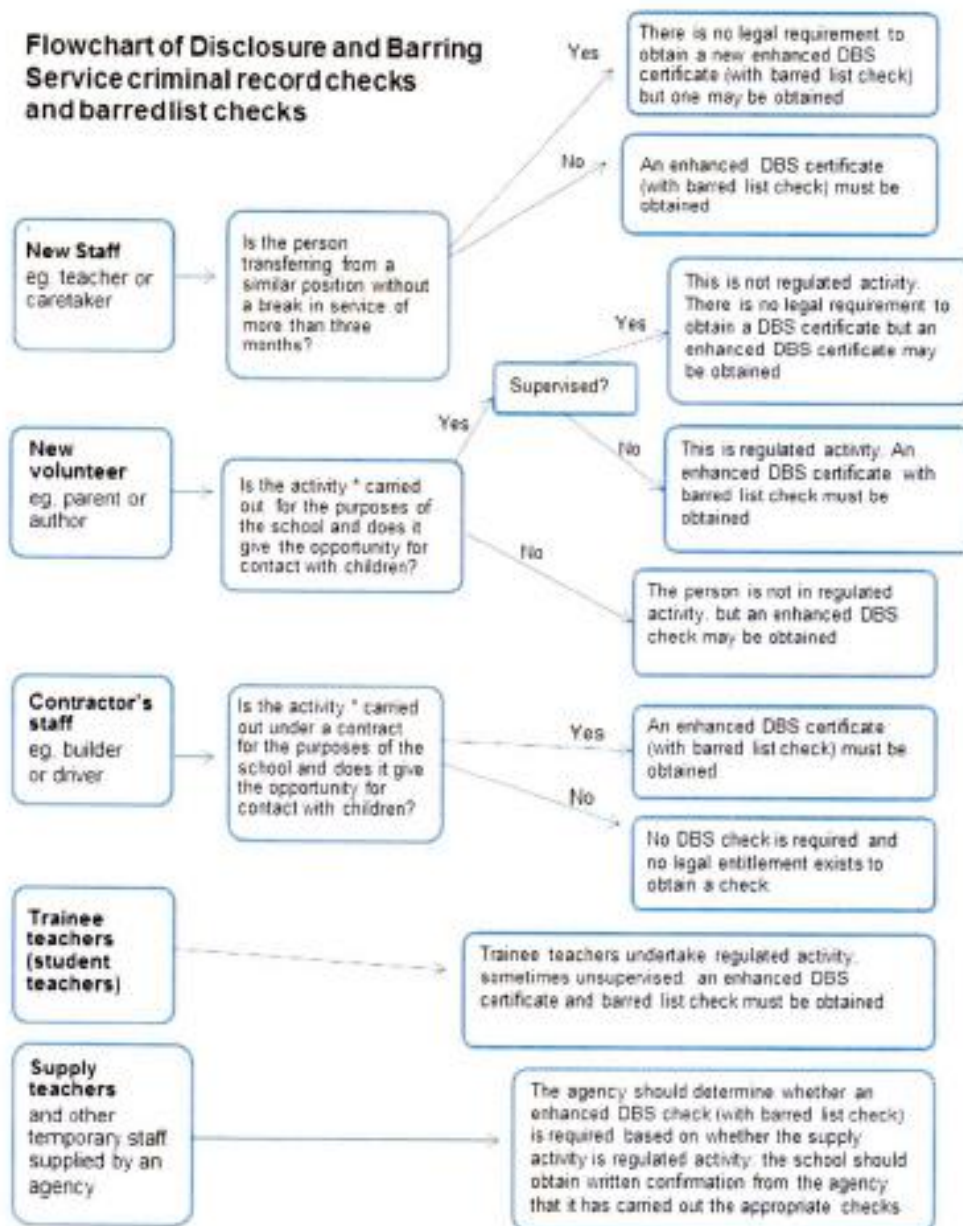
Retention

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary. This generally takes up to six months to consider and resolve any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for more than six months, we will consult the DBS about this. We will consider the individual's Data Protection and Human Rights before doing so. The usual conditions regarding safe storage and strictly controlled access will prevail throughout this time.

Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately and suitably destroyed by secure means, i.e., shredding, pulping, or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the certificate or any copy or representation of the certificate's contents. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of Disclosure requested, the position for which the disclosure was requested, the unique reference number of the Disclosure, and the details of the recruitment decision taken.

Flowchart of Disclosure and Barring Service criminal record checks and barred list checks



* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'