



# Royal Russell

## **STAFF RECRUITMENT, SELECTION AND DISCLOSURES POLICY**

### **1. OBJECTIVES**

The School's objectives in appointment are to recruit the person who is most suited to the particular job based on their relevant abilities, qualifications, experience and skills for the post. Recruitment and selection decisions will always be made on the basis of merit, not on the grounds of gender, gender reassignment, colour, race, caring responsibilities, marital or civil partnership status, sexuality, sexual orientation, disability, nationality, ethnic or national origins, religion or belief, pregnancy or maternity leave, trade union membership or age.

The School is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority. The School aims to recruit staff that share and understand our commitment, and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010. This commitment will be made clear to potential applicants at each stage of the recruitment and selection process.

Any candidate with a disability will not be excluded unless it is clear that a candidate is unable to perform a duty that is intrinsic to the role, having taken into account reasonable adjustments.

All queries on the School's Application Form and recruitment process must be directed to the HR department.

An entry will be made on the Single Central register for all members of staff currently working at the School, members of the Governing Body (including those registered with the DfE or responsible for the management of the School) and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.

All checks will be made in advance of appointment or as soon as practicable after the appointment.

### **2. SCOPE OF THIS POLICY**

This policy applies to all staff directly recruited and employed by the School as defined by the Education (Independent Schools Standards) (England) Regulations 2014, which defines staff as any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract (eg visiting music teachers, sports coaches etc), but does not include supply staff or a volunteer.

In the case of agency or contract workers, the School shall obtain written confirmation from the agency or company that it has carried out appropriate pre-employment checks on anyone supplied to work at the School, conduct an identity check on the agency or contract worker on their arrival in School and obtain a copy of their enhanced DBS disclosure check. A record of the checks made on agency or contract workers will be included on the Single Central Register including identity check and seen a copy of the disclosure (whether or not it discloses any information). Unchecked contractors will under no circumstances be allowed to work unsupervised in the School. The School will determine the appropriate level of supervision depending on the circumstances.

In the case of volunteers, the pre-employment checks listed in Appendix B will be carried out as appropriate for the role.

Certain individuals are automatically disqualified from acting in senior management positions within a charity. Whether an individual falls into the category of a senior management position is judged using the following criteria:

- A person who is accountable only to the Governors, and who carries overall responsibility for the day-to-day management and control of the charity (the Headmaster).
- A person who is accountable only to the Head or the Governors, and who is responsible for the overall management and control of the charity's finances. (the Director of Operations).

Being disqualified means that a person cannot take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or 'waived') the disqualification.

Any staff who TUPE transfer into the School's staff will be required to undertake the statutory requirements with regard to safer recruitment checks.

If staff are transferred under TUPE (gap of three months or less and information complete) information will be passed to the new employer and a note made on the Single Central Register that details have been accepted under TUPE.

### **3. AUTHORITY TO RECRUIT**

Before any recruitment activity takes place the recruiting manager (responsible for the vacant post) should first consider whether the vacancy needs filling, whether the work could be reorganised or performed in another more cost-effective way and whether the post is still appropriate, relevant and meets the needs of the School. Rather than always directly replacing a vacancy consideration should be given to the need for it alongside a review of the job description and the person specification (see Section 4) to ensure that the School is recruiting the right people to the right posts in line with the Annual Development Plan.

Once it has been established that there is a genuine need to recruit to a post (whether existing, revised or new), and the review of the role has been completed, the line manager should seek authorisation from SLT to commence the recruitment activity.

### **4. JOB DESCRIPTION/PERSON SPECIFICATION**

When a job becomes vacant or a new post identified, the line manager will assess the requirements of the job and the qualities required of the person best suited to fill the post. A job description and a person specification will be produced or updated for each post and will include the following:-

a. Job description:-

- The main purpose, scope and context of the job.
- The duties and responsibilities.
- The person to whom the job holder is responsible and, where appropriate, the number and type of staff supervised.

General statement on responsibility to safeguard and promote the welfare of children, comply with School policies and procedures including health and safety, to attend relevant training and to wear an ID card at all times.

b. Person specification (essential requirements plus any desirable requirements which may assist in shortlisting):-

- Qualifications (and training).
- Skills, knowledge and abilities.
- Experience.
- Any specific requirements related to the working conditions required by the role.

## **5. ADVERTISING**

Jobs will be advertised internally or externally (or both) whenever practicable. Advertisements will not contain any clauses, conditions or requirements that would disqualify any group or individual, except in cases where this is permissible under employment law. All adverts will state the School's commitment to safeguarding.

## **6. APPLICATIONS**

Applications will only be accepted if they are submitted on the standard School application form which must be fully completed. CV's will not be accepted in substitution for completed application forms. All applications will be acknowledged on receipt and candidates informed of the proposed timescales for interviews and the deadline date after which they may assume that their application has been unsuccessful. Checks will be made of previous employment history to ascertain satisfactory reasons for any gaps in employment. These checks will then be checked against references and any discrepancies discussed with the candidate.

## **7. SAFEGUARDING CHECKS**

The School will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. As employment at the School involves substantial opportunity for access to children, all applicants must provide the School with legally accurate answers. Upfront disclosure of a criminal record may not debar a candidate from appointment as the School shall consider the nature of the offence, how long ago and at what age it was committed, the job applied for and any other relevant factors. (See Appendix A-Policy on the Recruitment of Ex-Offenders). Such information should be submitted in confidence in a separate sealed envelope to HR which will be seen and destroyed by the relevant Headmaster/Director of Operations. If candidates would like to discuss this beforehand, they should telephone the HR Manager for advice.

Any unspent convictions, cautions, reprimands or warnings must be disclosed to the School. However amendments to the Exceptions Order 1975 (2013) provide that certain spent convictions and cautions are 'protected' and are not subject to disclosure to employers, and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found at the Disclosure and Barring Service website.

The successful applicant will be required to apply for an enhanced Disclosure from the Disclosure and Barring Service ("DBS") for the position. Additionally, successful applicants should be aware that they are required to notify the School immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration. A separate check on the Barred List will also be undertaken.

The statutory guidance "Disqualification under the Childcare Act 2006 (July 2018)" applies to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare. Due to the nature of the school site, all staff are required to complete the School's "Staff Suitability Declaration" form.

The school takes its responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect his/her suitability to work with children must notify the Headmaster immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff and/or successful candidates who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the HR Manager for more details.

Failure to declare any convictions (that are not subject to DBS filtering) may disqualify a candidate for appointment or result in summary dismissal if the discrepancy comes to light subsequently.

The School has a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent duty. Schools are required to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Accordingly, as part of the recruitment process, when an offer is made the offer will be subject to a Prevent duty risk assessment [more guidance for schools from the DfE on this can be found at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)].

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

## **8. INTERVIEW**

The School will short-list applicants according to the relevance and applicability of their professional attributes and personal qualities that are relevant to the role. Short-listed applicants will be invited to attend a formal interview at the School at which their relevant skills and experience will be discussed in more detail and questions will always be asked about their suitability to work with children. For certain posts the selection process may involve undertaking relevant tasks or tests. The interview will be structured to ensure that all candidates are treated in the same way, with the exception of questions asked to clarify information given on the application form/curriculum vitae or to follow up issues raised at interview. No questions of a personal nature will be asked, or any that may be deemed discriminatory.

A selection panel consisting of at least one manager who has passed the Safer Recruitment training course and at least one other member of staff will interview candidates. One or more Governors may be involved in the appointment of certain senior posts, while a panel of Governors will be convened to appoint the Senior School Headmaster, Junior School Headmaster and Director of Operations. Specialist opinion may be co-opted to advise the selection/interview panel as required. The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and if necessary a judgement will be made by the selection panel Chair whether or not an interviewer should withdraw from the panel. Should the Chair have a conflict of interest, the Vice Chair shall decide whether the Chair should withdraw from the panel.

All candidates invited to interview must bring documents confirming their educational and professional qualifications relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, they must obtain written confirmation of the relevant qualifications from the awarding body.

In order to verify the identity of anyone invited to interview, all candidates will be asked to bring to interview the following original documents which will be copied, signed and dated:-

1. A passport AND either a current driving licence including a photograph or a full birth certificate;
2. A utility bill or financial statement **issued within the last three months** showing the candidate's current name and address;
3. Where appropriate any documentation evidencing a change of name;
4. Where the candidate is not a citizen of a country within the European Economic Area or Switzerland, proof of entitlement to work and reside in the UK.
5. A current enhanced DBS disclosure check, if available, and details of the DBS Update Service number, if the candidate has subscribed to this service.

Photocopies or certified copies are not acceptable forms of identification.

Candidates with a disability who are invited to interview should inform the School of any necessary reasonable adjustments or arrangements to assist them in attending the interview and to ensure that they are not disadvantaged.

Written records of the interviews will be used as the basis for decision-making and will be kept on file. Interview notes for unsuccessful applicants will be kept for six months and then destroyed as confidential waste.

Reasonable travel expenses, based on second-class rail fare, will be reimbursed.

## **9. CONDITIONAL OFFER OF APPOINTMENT AND PRE-EMPLOYMENT CHECKS**

Any offer of appointment will be conditional upon:-

1. Receipt of at least two references that are satisfactory to the School including one from their current or most recent employer/education institution (if these have not already been received);
2. Verification of identity and address;
3. Evidence of the right to work in the UK;
4. A satisfactory enhanced DBS check;
5. A check of the Barred List maintained by the DBS;
6. For a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State. Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:
  - Planning and preparing lessons and courses for pupils,
  - Delivering and preparing lessons to pupils,,
  - Assessing the development, progress and attainment of pupils,
  - reporting on the development, progress and attainment of pupils;
7. Verification of professional qualifications including teaching qualifications, where appropriate;
8. Verification of successful completion of the statutory induction period (for teaching posts - applies to those who obtained QTS after 7 May 1999);
9. Where the successful candidate has worked or been resident overseas for at least 6 months in the last 5 years prior to the appointment, such checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered;
10. Satisfactory medical fitness by completion of the School's on-line pre-employment medical questionnaire. The information contained in the questionnaire will then be held by the School's Occupational Health Adviser in strictest confidence and processed in accordance with the Recruitment Privacy Notice and Data Protection Policy. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements

of the role i.e. proposed workload, extra-curricular activities, layout of the School. The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

11. Receipt of a signed Staff Suitability Declaration form showing that the candidate is not disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006 (July 2018)";
12. For a candidate to be employed into a senior management position as set out above in section 2 "Scope of this Policy", receipt of a signed "senior charity manager positions: automatic disqualification declaration" confirming that the candidate is not disqualified from acting in a senior management position for a charity in accordance with the automatic disqualification rules for charities;
13. For a candidate to be employed in a management role, a check will be carried out under s128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to Governors, SLT and all Heads of Department; and
14. For a candidate who has lived or worked outside the UK, an EEA check using the Teaching Regulation Agency employer access system for information about any teacher sanction or restriction.

All the above pre-employment checks must be completed to the School's satisfaction **before** an individual commences employment with the School.

However, if receipt of an enhanced disclosure is delayed, the Headmaster may, at his discretion, allow the member of staff to commence work under controlled conditions subject to the following checks having been completed prior to starting which will be set out in a risk assessment signed by all parties:

- a satisfactory check of the barred list and completion of all other relevant checks (including any appropriate prohibition checks), if the person will be working in regulated activity;
- the DBS disclosure has already been applied for;
- appropriate safeguards have been put in place (for example, loose supervision) which are reviewed at least every two weeks by the line manager and member of staff;
- the person in question is informed what these safeguards are and has agreed to them;
- the appointment has not been confirmed; and
- a note is added to the single central register and evidence kept of the measures put in place.

Portability of disclosures from another educational institution are allowed in certain limited circumstances as follows:-

Where the new member of staff ("M") has worked in: -

- (a) A School or a maintained School in England in a position which brought M regularly into contact with children or young persons;
  - (b) A maintained School in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or
  - (c) An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons,
- during a period which ended not more than three months before M's appointment.

In these circumstances the School may apply for a disclosure but is not required to do so. The current/previous employer will be asked to confirm that the member of staff's employment was satisfactory and that they had no concerns about their suitability to work with children. A new, separate barred list check will be obtained.

Where an applicant subscribes to the DBS Update Service they must consent to the School checking that there have not been changes since the issue of the original disclosure certificate and provide that certificate for the school to copy. A separate barred list check will still be required.

The School is legally required to verify the medical fitness of anyone appointed to a post at the School, **after** an offer of employment has been made but **before** an appointment can be confirmed. All successful candidates will therefore be asked to complete an on-line pre-employment health questionnaire which will be assessed by the School's Occupational Health Adviser against the requirements for the particular role, such as any physical or mental requirements, anticipated workload, extra-curricular activities, layout of the School etc in line with the DfE occupational health guidance for employment of teachers "Fitness to Teach". If the Occupational Health Adviser has any concerns about an applicant's fitness the School will consider any recommendations made about any reasonable adjustments in consultation with the applicant. If necessary further medical opinion may be sought from a specialist or consultant, or the applicant may be asked to undertake a full medical assessment.

The School will comply with the provisions of the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

## **10. REFERENCES**

Where possible, the School will seek references for shortlisted candidates prior to interview in order to verify particular experience or qualifications. If the candidate does not wish the School to take up references in advance of the interview, they should indicate accordingly on their application form. If a reference has not been obtained before interview because the candidate has refused permission or because the interview date does not allow time to seek references, the selection panel will make a decision on the information available, and any job offer will be made conditional on receipt of satisfactory references.

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 candidate and the relevant referee before any appointment is confirmed or any offer withdrawn.

All referees will be asked if the candidate is suitable to work with children or young people. If the candidate is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure.

If the candidate is not currently working with children but has done so in the past, the School will ask their previous employer about those issues. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university.

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.

## **11. OUTCOME OF SELECTION PROCESS**

Candidates will be informed of the outcome of the interview as soon as possible. Any offer made will be conditional upon receipt of satisfactory information from all pre-employment checks. Before any offer is confirmed in writing, HR will carry out a check on the Barred List for all posts, for teaching posts, the list of Prohibited Staff maintained by the Secretary of State and for management posts, the list of staff barred from the management of independent Schools maintained by the Secretary of State.

## **12. CRIMINAL RECORDS POLICY**

The School will refer to the Department for Education (DfE) document “Keeping Children Safe in Education (KCSIE) and any amended version in carrying out the necessary required DBS checks together with the provisions of the ISI Handbook for the Inspection of Schools, as updated.

The School complies with the provisions of the DBS Code of Practice, a copy of which may be accessed at <https://www.gov.uk/government/publications/dbs-code-of-practice>

## **12. RETENTION AND SECURITY OF RECORDS**

The School will comply with its obligations regarding the retention and security of records in accordance with the provisions of the General Data Protection Regulation (GDPR) and DBS Code of Practice (as amended), and its Data Protection and Data Retention Policies, and will store all disclosure information and other confidential documents issued by the DBS in locked, storage containers, access to which will be restricted to the HR team and members of the School’s Senior Leadership Team. Copies of DBS certificates will not be retained for longer than is necessary (normally 6 months). However, a record of the DBS disclosure number, type of disclosure and date of issue will be recorded on the School’s Single Central Register, as this is required for both Inspection and regulatory purposes. All disclosure information will be destroyed by secure methods (such as shredding or burning).

The School will comply with its data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice (Appendix C) and the Data Protection Policy.

Photocopied evidence of ID, right to work in the UK, medical fitness and relevant qualifications checks, together with other appropriate documentation, will be kept on the employee’s personnel file. This documentation will be retained during the period of employment of the successful candidate and will be securely destroyed after employment ends in accordance with the School’s Data Retention Policy.

If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after 6 months unless the applicant has requested that the School retain their information on file for potential future roles at the School.

## **13. CHECKS DURING EMPLOYMENT**

The School takes its responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect his/her suitability to work with children during recruitment or employment must notify the School immediately. This will include notification of any court appearances, convictions, cautions, court orders, reprimands or warnings he/she may receive.



## 14. INDUCTION

All new staff require support and appropriate induction to ensure that they are effective as quickly as possible in their new role. This will be devised and organised by the relevant line manager and will include generic School elements, and induction specific to the role undertaken. All new staff will receive Child Protection and Safeguarding training as part of their induction including access to a package of online safeguarding training courses. Satisfactory completion of this training will be reviewed as part of the probationary period.

## 15. ASSOCIATED POLICIES

In order for this policy to be applied effectively it must be read and understood in conjunction with other School policies, most particularly:

Staff Probationary Policy

Staff Induction Policy

Staff Code of Conduct

Safeguarding (including Child Protection) Policy and Procedures

Equal Opportunities and Dignity at Work Policy

Preventing Extremism and Radicalisation Policy

Reviewed by EWC	9 May 2018
Approved by Board	15 June 2018
Updated and approved by EWC	10 October 2018

**Policy on the Recruitment of Ex-Offenders**

The School will not unfairly discriminate against any candidate 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 individual 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 below.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for the School to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for the School to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful for the School to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the Childcare (Disqualification) Regulations 2009, whether by association, or otherwise.

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. The School will report the matter to the Police and/or the DBS if:-

- the School receives an application from a disqualified person;
- is provided with false information in, or in support of an applicant's application; or
- the School has serious concerns about an applicant's suitability to work with children.

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;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
- 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.

## Policy on the Recruitment of Volunteers

### 1. General

Royal Russell School ("the School") is committed to ensuring the best possible environment for the children and young people (including EYFS) in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

The School aims to recruit volunteers that share and understand our commitment to the aims of the School.

All queries on the School's recruitment process must be directed to the HR Department.

### 2. Recruitment

2.1 Volunteers at our School bring with them a range of skills and experience that can enhance the learning opportunities of pupils. The Board of Governors therefore, welcomes and encourages volunteers from the local community to assist in its day to day running. The kinds of activities that volunteers may assist with are hearing pupils read, working with small groups of pupils to assist them in their learning, working alongside individual pupils, as an additional tutor, or accompanying School visits. Volunteers may also provide support in other areas of the School, for example office work or in a specialised department or team.

2.2 Volunteers will be subject to an informal recruitment process which will involve a meeting with the relevant Deputy Head/Head of Department to discuss the requirements of the School and the skills of the volunteer. The purpose of this meeting will be to understand whether the prospective volunteer has any previous relevant experience and find out whether the expectations and requirements of each party meet, and whether there is a volunteering opportunity at the School. In addition a risk assessment will be completed for each volunteer to assess whether or not an enhanced DBS check is needed.

2.3 Volunteers will be recruited and vetted via the process set out below. Volunteers who take part in a regulated activity will be subject to additional safer recruitment checks.

Regulated activity is defined as:

- (i) regular work in the School with opportunity for contact with children. This is not work by supervised volunteers.
- (ii) unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/ guidance on well-being, or drive a vehicle only for children, if done 'regularly' (see above)
- (iii) relevant personal care, e.g. washing or dressing; or health care by or supervised by a professional; Applies to any child, even if done only once.

Any volunteer who has not been subject to additional recruitment checks must not work in an unsupervised capacity at any time.

2.4 Any volunteering placement may be offered subject to the following checks, following a risk assessment by the School about the nature and frequency of the work, potential for contact with children, and knowledge of the volunteer gained from staff, parents and other volunteers (both formal and informal):

1. an identity check, with photographic evidence;

2. if the volunteer will be undertaking a regulated activity, an enhanced DBS certificate and a barred list check;
3. evidence of their entitlement to work in the UK, where relevant;
4. receipt of a signed Staff Suitability Declaration form showing that the volunteer is not disqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006 (July 2018)”;
5. depending on the nature of the role, the volunteer may also be asked to sign a confidentiality statement;
6. references may also be required and there should be no objection to the volunteer from any member of the School community

### 3. Induction

Volunteers will be provided with training on the following matters once the volunteering placement commences:

- Child Protection Policy and safeguarding obligations
- Preventing Extremism and Radicalisation Policy
- Staff Code of Conduct (including Behaviour Policy)
- Health and Safety and Fire Evacuation procedures
- Confidentiality obligations
- Supervision
- Data Protection
- Anti-Bullying Policy (if relevant)
- PSHE Policy (if relevant)

### 4. Data Protection

The School will comply with its obligations under the relevant data protection legislation. Volunteers’ attention should be drawn to the Staff Privacy Notice and Data Protection Policy which sets out details of how the School will process volunteers’ personal data.

### **Privacy Notice (Recruitment)**

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the staff recruitment process. It applies to all individuals applying for a position at the School, including positions as a member of staff (full time or part time), contractors, workers, governors, volunteers and peripatetic staff. We are required to notify you of this information, under data protection legislation and are committed to being transparent about how we collect and use that information. We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

This privacy notice is non-contractual and can amended at any time.

#### **WHO COLLECTS THE INFORMATION**

Royal Russell School ('School') is a 'data controller' and gathers and uses certain information about you.

#### **DATA PROTECTION PRINCIPLES**

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

#### **WHAT PERSONAL INFORMATION DOES THE SCHOOL COLLECT AND HOLD**

We collect a range of information about you including:-

- (a) Name, title, address, marital status, gender and contact details, including email address and telephone number;
- (b) Date of birth;
- (c) Details of qualifications, skills, experience and employment/education history
- (d) Application form, covering letter, interview notes, correspondence relating to the outcome of the recruitment process;
- (e) Information on current salary, including benefit entitlements, and
- (f) CCTV footage captured when you visit the School site.

This is collected from your application form, covering letter, CV, your passport or other photo identity document, qualification certificates, or during the selection process including the formal interview, any task or selection exercise.

In line with safer recruitment regulations, we may collect information before an offer of employment has been made, for example references supplied by former employers, employment agencies, and information from employment background check providers and information from criminal record checks as required by statutory recruitment regulations. On occasion we may collect additional information from publicly available sources, such as social media sites, for example, LinkedIn.

We may also process information about your entitlement to work in the UK so that we can check that you are legally entitled to work for the School, whether or not you have a disability in order for us to make reasonable adjustments during the recruitment process and information on unspent criminal convictions in line with our legal obligations. Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in Appendix A of this policy.

#### **WHY DO WE NEED TO PROCESS THIS INFORMATION**

We need to process information prior to deciding whether to offer employment, (whether permanent, temporary or casual), including inviting you to take part in a selection process and ultimately to enter into detailed contractual terms with you, or to offer voluntary or other work

with us. Therefore we have a legitimate interest in processing personal information during the recruitment process and for keeping records of the process. Processing information from applicants allows us to manage the recruitment process, assess and confirm your suitability for employment and decide to whom to offer employment. We may also need to process information from applicants to respond to and defend against legal claims. The information we collect about you may be held at our offices or by third party agencies, service providers, representatives and agents as described above.

### **WHO HAS ACCESS TO THIS INFORMATION**

We will share this information with those who need to see it during the selection process to support the recruitment decision, which will normally include the selection panel, the recruiting manager, the HR team and on appointment, the IT Team and the School Data Manager to enable the new employee to be provided with appropriate support to complete their responsibilities effectively. No information will be shared with third parties other than name and email address which will be supplied to the School's Occupational Health Adviser.

### **HOW LONG DO WE KEEP YOUR INFORMATION**

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable (normally no longer than 6 months after the end of the recruitment process), taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment and this will be transferred to your personnel file on RoyalRussellPeople as part of the on-boarding process and retained during your employment. For further information, see the Staff Privacy Notice.

Further details on our approach to information retention and destruction are available in our Data Retention Policy.

### **YOUR RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED**

Please contact our Data Protection Officer (DPO) (the Director of Operations), who can be contacted by email to [ncufley@royalrussell.co.uk](mailto:ncufley@royalrussell.co.uk) or by telephone on 0208-657-9702 if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our Data Protection Officer for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our Data Protection Officer will provide you with further information about the right to be forgotten, if you ask for it.

### **KEEPING YOUR PERSONAL INFORMATION SECURE**

We take the security of your personal information very seriously and have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it and/or use it in the proper performance of their duties. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Personal information is stored securely on School systems to ensure that only authorised users can access and use information. Where third parties are engaged to process personal information on our behalf, they do so on the basis of a written contract, are under a duty of confidentiality and are required to implement appropriate technical and other measures to ensure the security of information.

#### **HOW TO COMPLAIN**

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone 0303 123 1113 for further information about your rights and how to make a formal complaint.