

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 selection 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.

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 set out their safeguarding requirements in the contract between the organisation and the school and must 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. These include identity, enhanced disclosure renewed every 3 years, right to work in the UK, barred list, prohibition, qualifications, overseas checks plus, those checks set out in KCSIE as 'pre-employment' checks. The School will conduct an identity check on the agency or contract worker on their arrival in School. The agency must confirm from their checks that the agency employee is suitable to work with children. A record of the checks made on agency or contract workers will be included on the Single Central Register including identity check dates that the agency performed their checks (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 budgetary provision has been checked, the line manager should seek authorisation from a member of 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, or on the online application form provided by TES or Eteach. CV's will not be accepted in substitution for completed application forms. All applications sent direct to the School 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. Short-listed candidates will be asked to complete a self-declaration form (Appendix D) confirming whether they have a criminal history or any information that would make them unsuitable to work with children. This will include questions about whether they are included on the barred list, are prohibited from teaching or in the management of an independent school (relevant posts only), any criminal offences committed in any country in line with the law as applicable in England and Wales, whether they are known to the police and children's social care, whether they have been disqualified from providing childcare and any relevant overseas information. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. 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). Details of any convictions or cautions should be provided in confidence in a separate sealed envelope to HR. If candidates would like to discuss this beforehand, they should telephone the HR Manager for advice. Any information disclosed will be discussed with the candidate as part of the selection process and cross-referenced with the paper copy of any DBS certificate subsequently applied for (for successful candidates) upon receipt. If the form is completed electronically candidates will be asked to sign the form at interview.

The successful applicant will be required to apply for an enhanced Disclosure from the Disclosure and Barring Service ("DBS") which includes a check on the Barred List. Any offer of employment will be conditional on obtaining such satisfactory checks. Additionally, successful applicants will be asked to complete a Staff Suitability Declaration Form setting out if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration.

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 will obtain references prior to interview. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview.

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].

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. At least two people will carry out the shortlisting exercise and the interview.

As part of the shortlisting process, the School will carry out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School’s wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment in line with Keeping Children Safe in Education 2022.

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. The interview panel will also consider any inconsistencies, look for gaps in employment and reasons given for them, and, explore all potential concerns. 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.

The interview will be conducted in person and the areas which it will explore will include suitability to work with children including where appropriate, any discussion of information shared by a candidate in their self-declaration form.

All candidates invited to interview must bring documents confirming all educational and professional qualifications set out in their application form (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 applicable, 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.

Exceptionally, where the recruitment and selection process has been amended due to social distancing requirements in the light of COVID or other pandemic, the candidate may show original documents to confirm their identity, right to work in the UK and qualifications to the panel over video link and the panel will verify sight of these. The candidate may then scan them to the School to enable their DBS application to be progressed but should then provide the originals in person at the earliest opportunity so they can be checked for indicators of fraud (and before the employee starts work). Both dates when the documents were seen remotely and in person will be entered on the Single Central Register (SCR).

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 and, if appropriate, a check of the Children's Barred List maintained by the DBS;
5. 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 or any sanction or restriction imposed (that remains current) by the historic General Teaching Council for England before its abolition in March 2012. 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;
6. Verification of professional qualifications including teaching qualifications, where appropriate;
7. Verification of successful completion of the statutory induction period (for teaching posts - applies to those who obtained QTS after 7 May 1999);
8. Where the successful candidate has worked or been resident overseas for at least 3 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. This shall include the candidate providing the School with proof of his/her past conduct as a teacher in the form of a letter of professional standing from the professional regulating authority in the country in which s/he has worked;
9. Satisfactory medical fitness by completion of the School's on-line pre-employment medical questionnaire..
10. 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)";
11. 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; and
12. 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;

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 without confirming the appointment 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);

- 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, set out in the job description and person specification 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 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.

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 and will approach previous employers for information to verify particular experience or qualifications, prior to interview. One of the references must be from the applicant's current or most recent employer. 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 any information provided by the referee with that provided by the candidate 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. References must be checked by the recruiting manager/relevant SLT manager before any conditional offer of appointment is confirmed.

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. The School will verify all references. Where references are received electronically, the School will ensure that they originate from a legitimate source.

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 date that the DBS certificate was issued 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 School Privacy Notice (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 (normally six years after employment has ended).

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:

- Probationary Procedure
- Staff Code of Conduct
- Safeguarding (including Child Protection) Policy and Procedures
- Equal Opportunities and Dignity at Work Policy
- Preventing Extremism and Radicalisation Policy
- Safeguarding Procedures for Visitors

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Reviewed and approved by	Board	March 2022
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To be Reviewed and approved by	Board	March 2023
Next Review		September 2024

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 2006 (July 2018), 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 recruited and vetted via the process set out below. Volunteers who take part in regulated activity will be subject to safer recruitment checks.

2.3 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 and the recruiting manager will exercise their professional judgement and experience to decide what checks, if any are required. The risk assessment will consider:

- the nature of the work with children, especially if it will constitute regulated activity, including the level of supervision (see paragraphs 292-293 about supervision);
- what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability; and
- whether the role is eligible for a DBS check and if it is, what level is appropriate.

Details of the risk assessment will be recorded. (paras 288 & 289)

The requirement for an enhanced DBS check, barred list check and prohibition from management depends on whether the volunteer is undertaking a regulated activity. (See Annex F of Keeping Children Safe in Education (issued July 2021)).

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.

2.5 DfE have provided guidance on when volunteers would be supervised:

- there must be supervision by a person who is in regulated activity (e.g. a teacher or classroom assistant);
- the supervision must be regular and day to day; and
- the supervision must be 'reasonable in all the circumstances to ensure the protection of children' (taking into account the age of the children, the number of children, whether or not other workers are helping to look after the children; the nature of the work, how vulnerable the children are, and the levels of supervision).

There is also a useful flowchart at Appendix 3 of the ISI Handbook and page 60 of KCSIE.

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.

RECRUITMENT PRIVACY NOTICE

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 application 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. It also applies to individuals we will contact in order to find out more about our job applicants, including referees, or those that are provided by job applicants as an emergency contact.

We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

WHO COLLECTS THE INFORMATION

Royal Russell ('School') is a 'controller' in relation to personal data and gathers and uses certain information about you. This means that we are responsible for deciding how we hold and use your personal information.

DATA PROTECTION PRINCIPLES

We will comply with the data protection law and principles when gathering and using personal information, as set out in our Data Protection Policy. This means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept safely and securely.

ABOUT THE INFORMATION WE COLLECT AND HOLD

The table in Part 1 of the Schedule below summarises the information we collect and hold, up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part 2 of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate and necessary for specific legitimate purposes. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

WHERE INFORMATION MAY BE HELD

Information may be held on school premises in our filing systems and on our servers. It may also be held on our behalf by third party agencies, service providers and representatives.

HOW LONG 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, or the application you are supporting (e.g. as a referee) is successful and you (the job applicant) 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, 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. This is likely to be for six months from the communication of the outcome of the

recruitment exercise which takes account of both the time limit to bring claims and for claims to be received by the School. If there is a lawful 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 you are an applicant and your application is successful and you join the School, 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 DATA 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 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 other rights including the right to ask for information we hold and process to be erased ('the right to be forgotten') or not used in certain circumstances. Our Data Protection Officer will provide you with further information about your data rights, if you ask for it. You may also want to read the Staff Privacy Notice which provides more detail on this.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes personal information being locked away, password protected or encrypted. We limit access to your personal information to those who have a genuine need to know it. 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 personal data breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

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, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or telephone 0303 123 1113 for further information about your rights and how to make a formal complaint.

SCHEDULE ABOUT THE INFORMATION WE COLLECT AND HOLD

A. Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your current and any former names, title, date of birth, gender, national insurance number, and contact details (i.e. current address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable [HR personnel or the manager of the relevant department] to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision
Your name, contact details and details of your qualifications, experience, employment history and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Consent (if given): if you are unsuccessful in your application, your details may be passed on to an associated School to see if they have any suitable vacancies	To see whether an associated School has any suitable vacancies.
Information about you that is publicly available online through online searches	From standard online searches using a web browser, website, or social media platform.	Legitimate interest: to form part of the school's wider safeguarding due diligence. Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit. To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE).	To make an informed recruitment decision. Search results will be reviewed and, if appropriate, explored with the applicant at interview. To comply with legal/regulatory obligations. For further information, see * below

<p>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</p>	<p>From you, in a completed anonymised equal opportunities monitoring form</p>	<p>To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)</p>	<p>To comply with our equal opportunities monitoring obligations and to follow our equality and other policies For further information, see * below</p>
<p>Details of your referees</p>	<p>From your completed application form</p>	<p>Legitimate interest: to carry out a fair recruitment process To comply with our legal obligations to request references</p>	<p>To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with [relevant managers, HR personnel and the referee]</p>
<p>Criminal Record Information or information that would make you unsuitable to work with children</p>	<p>From your self-declaration form</p>	<p>Legitimate interests: to carry out a fair recruitment process including giving candidates the opportunity to discuss their disclosure with the School before a DBS check is obtained. To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)</p>	<p>To make an informed recruitment decision and given candidates the opportunity to discuss their disclosure with the School. To comply with legal/regulatory obligations For further information, see * below</p>

B. Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time keeping and attendance, the reason you left your current or most recent post, and facts of any substantiated safeguarding concerns/allegations that meet the harm threshold under the statutory guidance "Keeping Children Safe in Education" (KCSIE), from references obtained about you from previous employers and/or education providers <input type="checkbox"/></p>	<p>From your referees (details of whom you will have provided)</p>	<p>Legitimate interest: to make an informed decision to recruit To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice</p>	<p>To obtain the required reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel</p>
<p>In respect of applicants for teaching positions who have lived or worked outside the UK, information about any sanctions or restrictions and/or any circumstances impacting your suitability to teach <input type="checkbox"/></p>	<p>From a letter from the professional regulating authority in the country (or countries) in which you have worked</p>	<p>Legitimate interest: to make an informed decision to recruit To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice</p>	<p>To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel Information shared with DBS and other regulatory authorities as required</p>

Information regarding your academic and professional qualifications <input type="checkbox"/>	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you To comply with our legal obligations	To make an informed recruitment decision
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) in accordance with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended) and, where appropriate, overseas criminal records checks <input type="checkbox"/>	From the Disclosure and Barring Service (DBS) From overseas jurisdictions in accordance with Home Office guidance In respect of agency and third-party staff (supply staff), from any agency or third party organisation In respect of fee-funded trainee teachers, from the initial teacher training provider	To perform the employment contract To comply with our legal obligations Legitimate interest: For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
[A copy of your driving licence] <input type="checkbox"/>	From you	To enter into/perform the employment contract To comply with the terms of our insurance	To make an informed recruitment decision Information may be shared with our insurer

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

School Criminal Record Self-Declaration Confidential

Shortlisted candidates please return this self-disclosure to the HR team at least one day prior to interview. If we have not received this, we reserve the right to cancel your invitation to interview.

You have been asked to complete this form because the role you have applied for is exempt from the Rehabilitation of Offenders Act 1974. The information disclosed on this form will not be kept with your application form during the application process.

Policy statement on recruiting applicants with criminal records

Royal Russell School is committed to safeguarding and promoting the welfare of children and we expect all staff to share this commitment. This post is exempt from the Rehabilitation of Offenders Act 1974 and therefore pre-employment checks will be carried out, references will be sought and successful candidates will be subject to an enhanced DBS check and other relevant checks with statutory bodies.

We comply with the Disclosure & Barring Service (DBS) code of practice and have a written policy on the recruitment of ex-offenders, both of which are available on request to HR or on our website at <https://www.royalrussell.co.uk/discover/vacancies>. As you have been shortlisted, you are required to declare any relevant convictions, adult cautions or other matters which may affect your suitability to work with children. As a result of amendments to the Rehabilitation of Offenders Act 1974 (exceptions order 1975) in 2013 and 2020, some minor offences are now protected (filtered) and should not be disclosed to potential employers, and employers cannot take these offences into account.

Please read the information at <https://3bx16p38bchl32s0e12di03h-wpengine.netdna-ssl.com/wp-content/uploads/2020/11/Filterin-flowchart-twitter.png> before answering the questions on this form. If you are unsure whether you need to disclose criminal information, you should seek legal advice or you may wish to contact Nacro or Unlock for impartial advice. There is more information on filtering and protected offences on the Ministry of Justice website at to [Nacro guidance](#) and [guidance published by the Ministry of Justice \(see, in particular, the section titled 'Exceptions Order'\)](#).

Nacro - <https://www.nacro.org.uk/criminal-record-support-service/> or phone 0300 123 1999 or email helpline@nacro.org.uk. All enquiries to this service are confidential.

Unlock - <http://hub.unlock.org.uk/contact/> phone 01634 247350 or text 07824 113848

We recognise the contribution that people with criminal records can make as employees and volunteers and welcome applications from them. A person's criminal record will not, in itself, debar that person from being appointed to this post. We will make judgements based on the particular characteristics of the job and in the course of discussions with the candidate in the light of what is disclosed. Any information given will be treated in the strictest confidence. Suitable applicants will not be refused posts because of offences which are not relevant to, and do not place them at or make them a risk in, the role for which they are applying.

Applicants are required to declare:

- All unspent convictions and conditional cautions
- All spent convictions and adult cautions that are not protected (i.e. that are not filtered out) as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2020).

All cases will be examined on an individual basis and will take the following into consideration:

- Whether the conviction is relevant to the position applied for.
- The seriousness of any offence revealed.
- Your age at the time of the offence(s).
- The length of time since the offence(s) occurred.
- Whether the applicant has a pattern of offending behaviour.
- The circumstances surrounding the offence(s), and the explanation(s) provided.
- Whether your circumstances have changed since the offending behaviour.

It is important that applicants understand that deliberate attempts to conceal the information requested in this form could result in disciplinary proceedings or dismissal. Further advice and guidance on disclosing criminal records can be obtained from [Nacro's Criminal Record Support Service](#).

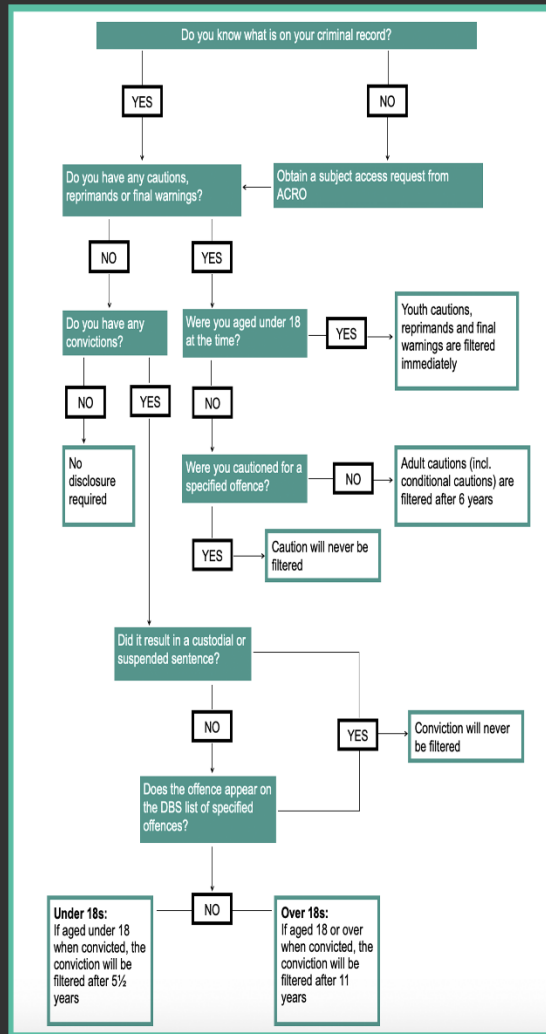
Please answer the following questions	
Name (including any previous names):	
Post Applied for:	Date of Birth:
1. Do you have any unspent convictions or adult cautions?	YES/NO
If yes, please provide details here	
2. Do you have any other UK cautions or convictions that would not be filtered ie are not spent?	YES/NO
If yes, please provide details here	
3. Have you been convicted for criminal offences in any other country which would be relevant to your suitability under English/Welsh law?	YES/NO
If yes, please provide details here	
4. Are you included on the DBS children's barred list (previously List 99)?	YES/NO
If yes, please provide details here	
5. Teaching posts only Are you, or have you ever been, prohibited from teaching by the TRA/NCTL or sanctioned by the GTCE?	YES/NO/NA
If yes, please provide details here	
6. Management posts only Have you been prohibited from management of an independent school (s128)?	YES/NO/NA

If yes, please provide details here	
7. Have you lived or worked outside the UK for more than 3 months in the last 5* years?	YES/NO
If yes, please provide details here	
8. Are you subject to any sanctions relating to work with children in any country outside the UK?	YES/NO
If yes, please provide details here	
9. The Disqualification under the Childcare Act 2006 Regulations (2018) state that anyone employed to care for children in early years (children under the age of 5) or later years (wrap-around care for children under the age of 8) is disqualified from that work if they meet certain criteria. These criteria include (this is not an exhaustive list): <ul style="list-style-type: none"> • Certain serious criminal offences • Court orders relating to the care of your own child • Being prohibited from private fostering Do you have any reason to believe you are disqualified from working in childcare? If yes, please contact us for more information on the Regulations.	YES/NO
<p>Please complete the declaration below:</p> <p>I declare that all the information I have provided in this disclosure form is full and correct at the time of application and that I have not omitted anything that could be relevant to the appointment of someone who will work with children. I understand that the recruitment panel may be made aware of any relevant information that I have disclosed in order to discuss the matter(s) with me as part of the recruitment process and that, if my application is successful, a risk assessment of the disclosed information will be held securely on my personnel file. I understand that the declaration of a criminal record will not necessarily prevent me from being offered this role.</p> <p>Signed: _____ Dated: _____</p>	

Please return this form to HR at least 24 hours before the interview date.

Please note that, if you are unsuccessful, this disclosure form will be securely destroyed 6 months from the date of interview. (More information is available in the Staff Recruitment Policy (Appendix A) available on the School website at <http://www.royalrussell.co.uk/discover/vacancies> or from HR on request.

Filtering Process Flowchart (DBS Vetting)



Discussion about information revealed on self-disclosure form**Name:****Date:****Name of interviewer:**

Jobs working at the school working with children are exempt from the Rehabilitation of Offenders Act 1975 so any convictions and cautions must always be disclosed to an employer.

1. In your self-disclosure form, you revealed some information about a criminal record. Please explain the circumstances.

2. Do you need to tell us anything else about this? What happened and who else was involved?

3. We view this very seriously and need to consider the next steps. What reassurances can you give us? What do you think we should now do?

4. **Risk assessment:**
 - Relevance of the conviction is relevant to the position applied for
 - The seriousness of any offence revealed
 - Age of the applicant at the time of the offence(s)
 - The length of time since the offence(s) occurred
 - Does the applicant have a pattern of offending behaviour
 - The circumstances surrounding the offence(s), and the explanation(s) provided
 - Have the applicant's circumstances changed since the offending behaviour

5. **Decision and safeguards to be implemented (if any).**