



# ALEXANDRA COLLEGE DUBLIN

## Garda Vetting Policy

In the context of the school's Mission Statement and of its commitment to the care and protection of its students and of all who work in the school, the Board of Management has adopted the policy set out hereunder to govern its application of vetting as part of its recruitment practice.

The policy has been framed in compliance with:

- DES circular letter 31/2016
- The Child Protection Procedures for Primary and Post Primary Schools (DES 2011)
- The National Vetting Bureau (Children and Vulnerable Persons) Act 2012 as amended by the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016
- The Data Protection Acts 1988 and 2003 (including The EU General Data Protection Regulation 2018)
- Employment Equality Acts 1998 and 2004
- Equal Status Act 2000
- Industrial Relations Act 1990

### 1. Outcomes of the Policy

- 1.1. To ensure that the school is a safe and secure environment
- 1.2. To ensure that vetting of school personnel is carried out to the highest standards of good practice, in compliance with all legal and ethical obligations and in an open, transparent and just manner.
- 1.3. To ensure that all applicants for vetting are assured that the highest standards of confidentiality are observed.

### 2. Policy Statement

All employees in Alexandra College will be Garda Vetted. This process will begin prior to the commencement of work. Employees will be vetted with either the Teaching Council or Joint Managerial Body (JMB).

### 3. Vetting Agencies

The School recognises the Teaching Council and Joint Managerial Body (JMB) as the two vetting agencies here in the school.

Barbara Ennis, College Principal will be the designated contact person who will be responsible for the implementation of this policy and for liaising with the liaison person in the Joint Managerial Body (JMB). The Principal will conduct the process on behalf of the school in conjunction with the Teaching Council, the JMB and with the Vetting Bureau.

As per JMB and NVB Guidelines, the School will retain a copy of each individual's IDs (One Photographic and One Proof of Address).

#### 4. Teaching Council Vetting

If the new employee is registered with the Teaching Council they must provide a disclosure of their vetting. Teachers must provide a copy of their disclosure to the School prior to starting. This can be done by contacting the Teaching Council and allowing the School access to download the document. The Teaching Council is responsible for the re-vetting of their teachers. Teachers vetted with the Teaching Council go through the process of re-vetting every three years. This process is solely dealt with by the Teaching Council. Employees should send updated disclosure statements to the School to keep on file. If a teacher is in the process of registering with the Teaching Council they must be vetted with JMB until they can provide a Teaching Council Vetting Disclosure. The School will retain a copy of a Teacher's vetting for the duration of their employment.

#### 5. Joint Managerial Body (JMB) Vetting

Any employees not vetted with the Teaching Council will be vetted through Joint Managerial Body (JMB), Secretariat of Secondary Schools. As per JMB Procedures, each employee will fill out an NVB 1 Form and submit two forms of identification which meet the points criteria of the National Vetting Bureau (NVB). One of these ID's must be photographic and the other must show proof of address. The Designated Contact Person (Principal) will check the criteria are met and send off the NVB 1 form to JMB for vetting. The School will retain copies of the two ID's for the duration of the person's employment. JMB does not require any re-vetting after a person has been initially vetted with them unless the person ceases employment and recommences with the same institution.

#### 6. Vetting Act

The Vetting Act, section 12 requires a school authority to obtain a vetting disclosure from the Vetting Bureau prior to employment of, contracting of, permitting or placement of a person to undertake relevant work or activities with children or vulnerable persons. This applies to all appointments of any duration including full-time, part-time and substitute positions. It is a criminal offence, other than in certain limited circumstances, for a school authority to commence the employment of an employee without first obtaining a vetting disclosure from the Bureau in respect of that person.

**Exemptions** - a school is not required to obtain a vetting disclosure from the Bureau:

- 6.1. For existing employees under employment contracts or existing arrangements in place prior to 29 April 2016.
- 6.2. Prior to re-employing a substitute or casual employee who was previously employed by the school prior to 29 April 2016.
- 6.3. If the school has received a copy of the Teaching Council vetting letter prior to 29 April 2016 even though the employment commences after that date.
- 6.4. In the case of recurring employment where the initial employment occurred after 29 April 2016 and a vetting disclosure was obtained from the Bureau.
- 6.5. In the case of the employment of, or entering into a contract for services with, a person on behalf of the State Examinations Commission (SEC) - locally

appointed superintendents of special centres, aural examinations, and practical examinations etc. (Nonetheless, JMB advises that such recruitment is carried out in a prudent manner and that, where possible, all such personnel are vetted. If vetting is not feasible such persons should provide a Statutory Declaration and Form of Undertaking.)

## 7. Recruitment

Thorough recruitment procedures must always be followed and are an essential element of child protection practice. Vetting does not take the place of recruitment procedures but is to be used as part of those procedures.

- 7.1. Best practice in checking references and previous employment history is essential.
- 7.2. A number of questions concerning child protection will be asked of job applicants.
- 7.3. The school will provide job applicants access to a document setting out its recruitment policies and procedures, with particular reference to its recruitment practice with regards to child protection. This document will alert applicants to the child protection-related questions which they may be asked to answer in writing.

## 8. Other Appointees

### 8.1. Volunteers/Coaches

- 8.1.1. The Principal or nominated school personnel will meet with and interview all volunteers, coaches, trainers, etc. who may be involved in relevant work or activities in the school from time to time.
- 8.1.2. The Board will have persons in this category vetted through JMB prior to their engagement by the school. However, it is permissible for two or more organisations to agree in writing that one organisation will have the person vetted. In any case, the school must see the vetting disclosure from the Vetting Bureau, whether this has been processed by the school through JMB or by the organisation with which the school has entered into a written agreement.

### 8.2. Residents of the school grounds

Vetting requirements in respect of any adult living on the school grounds will be undertaken, regardless of whether they are involved in school activities. Vetting is carried out through the Principal's Office and JMB.

### 8.3. Student Teachers

Student teachers must be vetted through JMB unless they have been vetted by the Vetting Bureau (post 29 April 2016) through their college and they furnish to the school the disclosure from the Vetting Bureau to enable the school to determine if the disclosure amounts to satisfactory vetting in terms of the school's vetting policy.

The Vetting Policy has been adopted by the Board of Management on 17 October 2023. The policy will be reviewed biennially or in line with any new regulations that are released.