SAFER RECRUITMENT POLICY

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

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

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position
- to ensure that all job applicants are considered equally and consistently
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, religious beliefs*, ethnic or national origin, pregnancy or maternity, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age
- to ensure compliance with all relevant legislation, recommendations and guidance including the Education (Independent College Standards) Regulations 2014 (**ISSRs**), the statutory guidance published by the Department for Education (**DfE**), *Keeping Children Safe in Education* (September 2025) (**KCSIE**), *Disqualification under the Childcare Act 2006* (**DUCA**), the Prevent Duty Guidance for England and Wales (**Prevent Duty Guidance**) and any guidance or code of practice published by the Disclosure and Barring Service (**DBS**); and
- to ensure that the College meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

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

**In accordance with the provisions of the Equality Act 2010 (Schedule 22) and relevant statutory guidance, there are limited circumstances where being of the Roman Catholic faith is a genuine occupational requirement. These circumstances relate only to certain posts where the duties of the role are closely connected to the religious ethos of the school (for example, leadership positions and the teaching of Religious Education).*

DATA PROTECTION

The College is legally required to carry out the pre-appointment checks detailed in this procedure. Staff and prospective staff will be required to provide certain information to the College to enable the College to carry out the checks that are applicable to their role. The College will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency. Failure to provide requested information may result in the College not being able to meet its employment, safeguarding or legal obligations. The College will process personal information in accordance with its Staff Privacy Notice.

RECRUITMENT AND SELECTION PROCEDURE

All applicants for employment will be required to complete an **application form** containing questions about their academic and employment history and their suitability for the role. Applicants will also be asked to provide details of their online profile, including account names and social media handles so that online searches can be carried out on shortlisted candidates (see section 5 for more information). This information must be provided by the applicant in order for the application to be accepted and may help identify any incidents or issues that have happened, and are publicly available online, which the College might want to explore with the applicant at interview.

On occasions the College may consider *curricula vitae* as part of the Recruitment process. Where this is the case, shortlisted candidates will be asked to complete an applicant prior to interview, allowing the College to identify any gaps in academic or employment history. Where these are identified, a satisfactory explanation must be provided at interview. Receipt of a completed and signed application form will be a requirement of employment.

Applicants will receive a job description and person specification for the role applied for. Application forms, job descriptions, person specifications, this policy and the College's safeguarding and child protection policies and procedures are available to download from the College's website or can be printed and forwarded to applicants on request.

The College will then conduct a shortlisting exercise by reviewing all application forms received in order to determine which applicants will be invited for interview. The shortlisting exercise will usually be conducted by two members of staff, who will ideally also be involved in the interview process.

Shortlisted applicants will be invited to attend a **formal interview** at which their skills and experience will be discussed in more detail. All shortlisted applicants will be tested at interview about their suitability to work with children.

At least one member of the formal interview panel will have received Safer Recruitment training so that they are aware of regulatory requirements.

All shortlisted applicants will be required to complete a self-declaration form prior to interview in which they will be asked to provide information about their criminal records history and other factors relevant to their suitability to work with children. This information will be considered and discussed with applicants at interview.

If the College decides to make an offer of employment following the **formal interview**, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the College's standard terms and conditions of employment
- verification of the applicant's identity (where that has not previously been verified)
- verification of qualifications, whether professional or otherwise, which the College takes into account in making the appointment decision, or which are referred to in the application form, whether a requirement for the role or not
- verification of the applicant's employment history
- the College being satisfied that any information generated through online searches does not make the applicant unsuitable to work at the College;
- the receipt of two references (one of which must be from the applicant's most recent employer) which the College considers to be satisfactory
- for positions which involve "teaching work", information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency which renders them unable or unsuitable to work at the College
- for applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at the College
- where the position amounts to ‘regulated activity’ the receipt of an enhanced disclosure from the DBS which the College considers to be satisfactory
- where the position amounts to ‘regulated activity’ confirmation that the applicant is not named on the Children's Barred List*

- information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at the College
- for management positions, information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at the College
- confirmation that the applicant is not disqualified from acting as a trustee / governor or senior manager of a charity under the Charities Act 2011 (if applicable,).
- confirmation that the applicant is not disqualified from working in connection with early or later years provision (if applicable)
- verification of the applicant's medical fitness for the role
- verification of the applicant's right to work in the UK; and
- any further checks which the College decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.

***The College is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The College is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, the College can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.**
Whether a position amounts to "regulated activity" must therefore be considered by the College in order to decide which checks are appropriate. It is however likely that in nearly all cases the College will be able to carry out an enhanced DBS check and a Children's Barred List check.

ARTIFICIAL INTELLIGENCE

The College does not use artificial intelligence software as a decision-making tool at any stage of the recruitment process, including in respect of external and internal applications and promotion proposals.

PRE-EMPLOYMENT CHECKS

In accordance with the recommendations set out in KCSIE, DUCA and the requirements of the ISSRs the College carries out several pre-employment checks in respect of all prospective staff.
In fulfilling its obligations to carry out pre-employment checks the College does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age. However, Salesian College, as a faith school, is permitted by law to take religion or religious beliefs into account in certain circumstances, as outlined in the School Standards and Framework Act 1998 ("the SSFA"). This means that the College may exercise discretion in determining whether faith or religious beliefs are relevant when considering the appointment, remuneration, or promotion of teachers. This applies to those whose religious beliefs or practices align with the College's religious denomination or those who provide, or are willing to provide, religious education in accordance with the tenets of the faith.

ONLINE SEARCHES

In addition to the checks set out below, the College reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to

determine whether they are suitable to work at the College. In accordance with paragraph 225 of KCSIE this will include online searches on shortlisted candidates. The online searches the College carries out may include searches of internet search engines, websites and social media platforms. Applicants will be asked in the application form to provide details of their online profile, including account names, social media and professional networking site handles and details of websites on which the applicant is featured or named. This information will be used to carry out online searches. Applicants are not required to provide account passwords or to grant the College access to social media or professional networking account content that is not publicly available. However, if information (such as profile pictures and / or account bios) is publicly available when a social media or professional networking site account is locked and can therefore be viewed by the College, it may be taken into account as part of the online search.

Online searches may be carried out at the shortlisting stage or after an offer of employment has been made (but prior to work commencing). The College will not carry out online searches as part of its initial sift of applications.

The College will determine how it approaches online searches. However, all applicants for a role at the College will be treated consistently regarding online searches.

Wherever possible online searches will be undertaken by a person who will play no other part in the recruitment process (including the shortlisting exercise) or the appointment decision. In carrying out online searches the College is looking for any publicly available information about an applicant that:

- may be relevant to their suitability to carry out the role for which they have applied;
- may be relevant to their suitability to work at the College or in an education setting;
- is of a safeguarding nature; and / or
- may have an impact on the College's reputation (whether positive or negative)

Any information generated from online searches will be entered in an 'Online search results record'. Where online searches are undertaken on shortlisted applicants any relevant information generated will be provided to the interview panel for discussion with shortlisted applicants at interview. Where online searches are undertaken on the successful applicant only any relevant information generated will be discussed prior to employment commencing. All offers of employment will be conditional upon the College being satisfied that the successful applicant is suitable to work at the College in light of any information generated from online searches.

In evaluating any online information for relevance, the College will use the following criteria:

- whether the information is relevant to the position applied for;
- whether the information is relevant to the applicant's suitability to work at the College or in an education setting;
- whether the information could have an impact on the College's reputation (whether positive or negative);
- whether the information calls into doubt the applicant's willingness or ability to uphold the College's commitment to safeguarding and promoting the welfare of children;
- the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published;
- whether the information reveals a pattern of concerning behaviour; and
- the relevant circumstances and the explanation(s) offered by the applicant.

For successful candidates, the College will retain information generated through online searches for the duration of the individual's employment and in accordance with its Information and Records Retention Policy after employment ends.
For unsuccessful candidates, the College retains the information generated from online searches for six months from the date on which they are informed their application was unsuccessful, after which it will be securely destroyed.

VERIFICATION OF IDENTITY, ADDRESS, RIGHT TO WORK IN THE UK AND QUALIFICATIONS

All applicants who are invited to an interview will be required to bring with them evidence of their identity, right to work in the UK, address and qualifications.

The College asks for this information at interview to ensure that the person attending the interview is who they claim to be, that they are permitted to work for the College if appointed and that they hold appropriate qualifications.

Identity and address: all applicants must bring with them to interview, original documents which evidence their identity and address as set out below and in the list of valid identity documents at Appendix 1 (these requirements comply with DBS identity checking guidelines):

- one document from Group 1*; and
- two further documents from either of Group 1*, Group 2a or Group 2b, one of which must verify the applicant's current address; and

(*applicants must always provide their birth certificate as one form of identity unless there is good reason why this cannot be provided).

Where an applicant informs the College that they have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change. They will also be required to provide their birth certificate.

The College asks for the date of birth of all applicants to verify identity and check for any unexplained discrepancies in the employment and education history. The College does not discriminate on the grounds of age.

Right to work in the UK: all applicants must also bring to interview a valid form of evidence which confirms their right to work in the UK. Valid forms of evidence can be found in the Home Office 'Right to Work Checklist': (Right to work checklist (publishing service.gov.uk)) and in some cases the evidence of your right to work in the UK can also be used as evidence of your identity and address for DBS identity checking purposes.

The College will check evidence of your right to work in the UK in accordance with the Home Office 'Code of Practice on preventing illegal working: Civil penalty scheme for employers: 6 April 2022' (which can be found here: https://www.gov.uk/government/publications/illegal-working-penalties-codes-of-practice-for-employers).

Qualifications: all applicants must also bring to interview original documents which evidence any educational and professional qualifications referred to in their application form and / or which the College requests.

Retention of records: the College will retain copies of the documents used to verify candidates' identity, right to work and qualifications in accordance with the Information and Records Retention policy.

REFERENCES

References will be taken up on short listed applicants prior to interview where possible.
Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

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

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. All referees will be sent a copy of the job description and person specification for the role for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title / duties, reason for leaving, performance, sickness and disciplinary record
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be unsubstantiated, unfounded, false or malicious
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people, except where the allegation or concerns were found to be unsubstantiated, unfounded, false or malicious
- whether the applicant could be considered to be involved in "extremism" (see the definition of "extremism" at section 7 below).

The College 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 College will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

If it has not been possible to obtain a reference prior to interview it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and/or the interview assessment form will be considered by the College. The applicant may be asked to provide further information or clarification before an appointment can be confirmed.

If factual references are received i.e. those which contain limited information such as job title and dates of employment, this will not necessarily disadvantage an applicant although additional references may be sought before an appointment can be confirmed.

The College may at its discretion make telephone contact with any referee to verify the details of the written reference provided.

The College treats all references given or received as confidential which means that the applicant will not usually be provided with a copy.

All references received from a School or College must be countersigned by the Head of that School or College.

All internal candidates who apply for a new role at the College will have their application assessed in accordance with this procedure. References may be taken up on internal candidates as part of the application process and can be provided by colleagues as the College will be the most recent employer and will previously have taken up references from past employers.

CRIMINAL RECORDS CHECKS

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

DBS FILTERING RULES

With effect from 28 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The filtering rules developed by the DBS and the Home Office designate certain spent convictions and cautions as "protected". "Protected" convictions and cautions are not included in a DBS certificate and job applicants are not required to disclose them during the recruitment process. It is unlawful for an employer to consider a conviction or caution that should not have been disclosed. If a protected conviction or caution is inadvertently disclosed to the College during the recruitment process it must be disregarded when making a recruitment decision.

A conviction will always be disclosable if it was imposed for a "specified offence" committed at any age. A caution issued for a "specified offence" committed over the age of 18 will always be disclosable. However, a caution issued for a "specified offence" committed under the age of 18 is never disclosable. "Specified offences" are usually of a serious violent or sexual nature or are relevant for safeguarding children and vulnerable adults. The list of "specified offences" can be found at:

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

The filtering rules have recently been updated and work as follows:

For those aged 18 or over at the time of an offence
A spent criminal conviction for an offence committed in the United Kingdom when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by the job applicant) if:

(a) eleven years have elapsed since the date of the conviction;
(b) it did not result in a custodial sentence; and
(c) it was not imposed for a "specified offence".

A spent caution for an offence committed when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant) if:

(d) six years have elapsed since the date it was issued; and
(e) it was not issued for a "specified offence".

For those aged under 18 at the time of an offence
A spent conviction for an offence committed when a person was under the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant) if:

(a) five and a half years have elapsed since the date of the conviction;
(b) it did not result in a custodial sentence; and
(c) it was not imposed for a "specified offence".

A caution issued for an offence committed when a person was under the age of 18 will never be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant).

REGULATED ACTIVITY

The College applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the College which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of the College will amount to "regulated activity" if it is carried out:

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

Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

It is for the College to decide whether a role amounts to "regulated activity" considering all the relevant circumstances. However, nearly all posts at the College amount to regulated activity. Limited exceptions could include an administrative post undertaken on a temporary basis in the College office outside of term time or voluntary posts which are supervised.

THE DBS DISCLOSURE CERTIFICATE

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to the College. It is a condition of employment with the College that the **original** disclosure certificate is provided to the College within two weeks of it being received by the applicant. Original certificates should not be sent by post. A convenient time and date for bringing the certificate into the College should be arranged with the HR Manager as soon as it has been received. Applicants who are unable to attend at the College to provide the certificate are required to send in a certified copy by post or email within two weeks of the original disclosure certificate being received, (by prior agreement with the HR Manager). Certified copies must be sent to the HR Manager. Where a certified copy is sent, the original disclosure certificate must still be provided prior to the first day of work or where this is not possible, on the first working day.

Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the College.

STARTING WORK PENDING RECEIPT OF THE DBS DISCLOSURE

If there is a delay in receiving a DBS disclosure the Headmaster has discretion to allow an individual to begin work pending receipt of the disclosure certificate. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once appropriate supervision has been put in place.

APPLICANTS WITH PERIODS OF OVERSEAS RESIDENCE

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. The College will consider the "DBS unusual addresses guide" in such circumstances.

For applicants who are living overseas, or who have lived overseas previously, obtaining a DBS certificate may be insufficient to establish their suitability to work at the College. In such cases the applicant will be required to provide additional information about their suitability from the country (or countries) in which they have lived. The College's policy is to request such information from each overseas country in which the applicant has lived for a period of three months or more in the previous 10 years.

When requesting such information, the College has regard to relevant government guidance and will therefore always require the applicant to apply for a formal check from the country in question i.e. a criminal records check (or equivalent) or a certificate of good conduct.

The College recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances the College will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country.

In addition, where an applicant for a teaching position has worked as a teacher outside of the UK, the College will ask the applicant to obtain from the professional regulating authority of the teaching profession in each country in which they have worked as a teacher, evidence which confirms that they have not imposed any sanctions or restrictions on the applicant and that they are not aware of any reason why the applicant may be unsuitable to work as a teacher. The College will also ask shortlisted applicants (and their referees) to disclose whether they have ever been referred to, or are the subject of a sanction issued by, the regulator of the teaching profession in the countries in which they have carried out teaching work.

Sanctions and restrictions issued by the regulating authority of another country will not prevent a person from working as a teacher at the College. However, the College will take all relevant information into account in determining whether an applicant is suitable to work at the College. The College may allow an applicant to commence work pending receipt of a formal check from a particular country if it has received a reference and / or letter of professional standing from that country and considers the applicant suitable to start work. Decisions on suitability will be based on all the information that has been obtained during the recruitment process. Unless expressly waived by the College, continued employment will remain conditional upon the College being provided with the outcome of the formal check and it being considered satisfactory.

If no information is available from a particular country the College may allow an applicant to commence work if they are considered suitable based on all the information that has been obtained during the recruitment process.

The College will take proportionate risk-based decisions on a person's suitability in these circumstances. All suitability assessments must be documented and retained on file
If the formal check is delayed and the College is not satisfied about the applicant's suitability in the absence of that information, the applicant's proposed start date may be delayed until the formal check is received.

PROHIBITION FROM TEACHING CHECK

The College is required to check whether staff who carry out "teaching work" are prohibited from doing so. The College uses the Teaching Regulation Agency Teacher Services system to check

whether successful applicants are the subject of a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the Teaching Regulation Agency.

In addition, the College asks all shortlisted applicants to declare whether they have ever been referred to, or are the subject of a sanction, restriction or prohibition issued by, the Teaching Regulation Agency or other equivalent body in the UK.

Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the Teaching Regulation Agency (or other equivalent body), whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, the College will consider whether the facts of the case render the applicant unsuitable to work at the College.

The College applies the definition of "teaching work" set out in the Teachers' Disciplinary (England) Regulations 2012, which states that the following activities amount to "teaching work":

- planning and preparing lessons and courses for students
- delivering lessons to students
- assessing the development, progress and attainment of students; and
- reporting on the development, progress and attainment of students.

The above activities do not amount to "teaching work" if they are supervised by a qualified teacher or other person nominated by the Headmaster. If in any doubt or if the applicant has taught previously, or may teach in future, the check will be undertaken, including for sports coaches.

PROHIBITION FROM MANAGEMENT CHECK

The College is required to check whether any applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent College (a **section 128 direction**).

The College will carry out checks for section 128 directions when appointing applicants into management positions from both outside the College and by internal promotion.

This check applies to appointments to the following positions made on or after 12 August 2015:

- Headmaster
- teaching posts on the senior leadership team
- teaching posts which carry a departmental head role; and
- support staff posts on the senior leadership team.

The College will assess on a case-by-case basis whether the check should be carried out when appointments are made to teaching and support roles which carry additional responsibilities.
All individuals who are appointed to the governing body will be subject to a section 128 direction check.

The relevant information is contained in the enhanced DBS disclosure certificate (which the College obtains for all posts at the College that amount to regulated activity). It can also be obtained through the Teaching Regulation Agency Teacher Services system. The College will use either, or both, methods to obtain this information.
In addition, the College asks all shortlisted applicants to declare whether they have ever been the subject of a referral to the Department for Education or are subject to a section 128 direction or any other sanction which prohibits, disqualifies or restricts them from being involved in the management of an independent College.

Where an applicant is not currently prohibited from management but has been the subject of a referral to, or hearing before, the Department for Education or other appropriate body, whether or not that resulted in the imposition of a section 128 direction or other sanction, or where a section 128 direction or other sanction has lapsed or been lifted, the College will consider whether the facts of the case render the applicant unsuitable to work at the College.

DISQUALIFICATION FROM ACTING AS A CHARITY TRUSTEE OR SENIOR MANAGER

Background
Under the Charities Act 2011 it is a criminal offence for a person to act as a trustee or senior manager of a charity when disqualified from doing so. The Charities Act 2011 sets out the grounds on which a person can be disqualified from acting as a trustee or senior manager. These include various spent and unspent criminal offences and other sanctions.

Who is covered
A person is considered to be a charity trustee if they are one of the people who have general control and management of the administration of the charity. In an independent College the trustees will typically be the governors of the College.

Senior managers include those employees who report directly to the charity trustees or have responsibility for the overall management and control of the charity's finances. At the College the disqualification rules will be applicable to all governors, the Headmaster, the Bursar and potentially other senior staff who report directly to the governors.

There is no single list or register that covers all the disqualification criteria and the College therefore adopts a pragmatic approach to checking whether a person is disqualified. This is achieved using a self-declaration form and the checking of relevant publicly accessible registers.

Self-declaration
All those who are covered by the disqualification rules are required to complete a self-declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria.

A failure to disclose relevant information, or the provision of false information, which subsequently comes to the College's attention may result in the termination of an appointment as a governor or senior manager or the withdrawal of an offer of employment and may also amount to a criminal offence.

All those who are required to complete a self-declaration form are also under an ongoing duty to inform the College if there is a change in their circumstances that results or may result in them becoming disqualified from acting as a governor or senior manager.

Checks by the College
To ensure that it has accurate and up to date information the College will also check the following registers in respect of each governor and senior manager who is already in post or is appointed in future:

a) the Bankruptcy and Insolvency Register;
b) the register of disqualified directors maintained by Companies House; and
c) and the register of persons who have been removed as a charity trustee.

Waiver
A person who discloses that one or more of the disqualification criteria is applicable to them may apply to the Charity Commission for a waiver of the disqualification.

The College may at its absolute discretion withdraw an offer of employment for a senior manager or cease or terminate an appointment to the governing body if a waiver application becomes necessary or is rejected by the Charity Commission. The College is under no obligation to await the outcome of a Charity Commission waiver application before taking such action.

MEDICAL FITNESS

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

Successful applicants will be required to sign a declaration of medical fitness confirming that there are no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the role. If an applicant prefers to discuss this with the College instead, or to attend an occupational health assessment to consider their fitness for the role, they should contact HR Manager so that appropriate arrangements can be made.

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

CONTRACTORS AND AGENCY STAFF

The College must complete the same checks for contractors and their employees undertaking regulated activity at the College as it does for its own employees. The College requires written confirmation from the contractor that it has completed these checks on all of those individuals whom it intends will work at the College before any such individual can commence work at the College.

Agencies who supply staff to the College must also complete the pre-employment checks which the College would otherwise complete for its staff. Again, the College requires confirmation that these checks have been completed before an individual can commence work at the College.
The College will independently verify the identity of individuals supplied by contractors or an agency in accordance with and requires the provision of the DBS disclosure certificate before those individuals can commence work at the College.

VOLUNTEERS

The College will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with students at or on behalf of the College.

The College will request an enhanced DBS disclosure without Children's Barred List information on all volunteers who do not undertake regulated activity. This is likely to be because their volunteering duties are subject to regular, day to day supervision by a fully checked member of staff or by a volunteer who the College has deemed appropriate to supervise and ensure the safety of those students in their care.

Under no circumstances will the College permit an unchecked volunteer to have unsupervised contact with students. If staff have a low-level concern about any contractors, they can follow the College process of informing the Head by completing the appropriate low- level concern form.
It is the College's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the College for three consecutive months or more. Those volunteers who are likely to be involved in activities with the College on a regular basis may be required to sign up to the DBS update service as this permits the College to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition, the College will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):

- formal or informal information provided by staff, parents and other volunteers
- character references from the volunteer's place of work or any other relevant source; and
- an informal safer recruitment interview.

VISITING SPEAKERS AND THE PREVENT DUTY

The Prevent Duty Guidance requires the College to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by students, are suitable and appropriately supervised: https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings

The College is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the College or perform any other regular duties for or on behalf of the College.

All visiting speakers will be subject to the College's usual visitor's protocol. This will include signing in and out at Reception, the wearing of a visitors' badge at all times and being escorted by a fully vetted member of staff between appointments. If staff have a low-level concern about any contractors, they can follow the College process of informing the Head by completing the appropriate low- level concern form.

The College will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and / or permit a speaker to attend the College. In doing so the College will always have regard to the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

"*Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces*"

In fulfilling its Prevent Duty obligations the College does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age.

POLICY ON RECRUITMENT OF EX-OFFENDERS

Background
The College will not unfairly discriminate against any applicant for employment based on conviction or other details disclosed. The College makes appointment decisions based on merit and ability. If

an applicant has a criminal record this will not automatically bar them from employment with the College. Each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All positions within the College are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules.

A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for the College to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the College. The College will make a report to the police and / or the DBS if:

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

ASSESSMENT CRITERIA

If 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 College 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; and
- the circumstances surrounding the offence and the explanation(s) offered by the applicant.

If the post involves regular contact with children, it is the College'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; or
- 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 College'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 College's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

ASSESSMENT PROCEDURE

If 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 College will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Bursar and the Headmaster of the College before a position is offered or confirmed.

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

RETENTION AND SECURITY OF DISCLOSURE INFORMATION

The College's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

WHISTLEBLOWING AND EXIT INTERVIEWS

All staff are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of students, the conduct of staff or other matters, during the course of their employment in accordance with the College's polices (including the Whistleblowing Policy, the Safeguarding Policy and the Staff Code of Conduct). All staff receive training so that they understand the College's expectations. Safeguarding children is at the centre of the College's culture and is accordingly considered formally during staff professional reviews and finally at an exit interview which is held with all leavers.

REFERRALS TO THE DBS AND TEACHING REGULATION AGENCY

This policy is primarily concerned with the promotion and practice of safer recruitment. However, applicants should also be aware that the College has legal responsibilities to fulfil when employment comes to an end. In particular, the College has a legal duty to make a referral to the DBS where:

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

The DBS will consider whether to impose sanctions on that individual which may restrict or prevent them from working with children in future.

In addition, if a teacher is dismissed because they are found to have committed serious misconduct, or they have breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the College will make a referral to the Teaching Regulation Agency.

The Teaching Regulation Agency will consider whether to impose a prohibition from teaching order.

THE SINGLE CENTRAL REGISTER (SCR)

The College must maintain a Single Central Register, a centralized record of all staff, volunteers and others who may have contact with students in the College.

The SCR holds data relating to all pre-employment and identity checks carried out on every individual within the establishment and is a legal requirement on all educational establishments in the UK.

Access to the SCR in College is restricted to the Bursar, Headmaster and the Human Resources Manager. These people are responsible for ensuring that the centralized register is completed in accordance with ISI statutory and regulatory requirements.

QUERIES

If an applicant has any queries on how to apply for a post at the College they should contact the HR Manager.

POLICY CONTROL	
Author	Senior Deputy Headteacher / Human Resources Manager
SLT Approved Date	3 October 2025
Governors Approved Date	23 October 2025
Review schedule	Annual
Date of next review	September 2026

Appendix 1 List of valid identity documents

Group 1: primary identity documents

- current valid passport
- biometric residence permit (UK)
- current driving licence photocard - full or \provisional (UK / Isle of Man and Channel Islands)
- birth certificate - issued within 12 months of birth (UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces)
- adoption certificate (UK and Channel Islands)

Group 2a: trusted government documents

- current driving licence: photocard - full or provisional (all countries outside the UK excluding Isle of Man and Channel Islands)
- current driving licence paper version if issued before 1998 - full or provisional (UK / Isle of Man and Channel Islands)
- birth certificate - issued after time of birth (UK, Isle of Man and Channel Islands)
- marriage / civil partnership certificate (UK and Channel Islands)
- immigration document, visa or work permit (issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa / permit must relate to the non-UK country in which the role is based)
- HM Forces ID card (UK)
- firearms licence (UK, Channel Islands and Isle of Man)

All driving licences must be valid.

Group 2b: Financial and social history documents

- mortgage statement (UK)**
- bank / building society statement (UK and Channel Islands)*
- bank / building society statement (countries outside the UK)*
- bank / building society account opening confirmation letter (UK)*
- credit card statement (UK)*
- financial statement - e.g. pension or endowment (UK)**
- P45 / P60 statement (UK and Channel Islands)**
- council tax statement (UK and Channel Islands)**
- letter of sponsorship from future employment provider (non UK only; valid only for applicants residing outside the UK at the time of application; must be valid at time of application)
- utility bill (UK; not mobile telephone bill)*
- benefit statement - e.g. child benefit, pension (UK)*
- a document from central or local government/ government agency / local council giving an entitlement - e.g. from the Department for Work and Pensions, the Employment Service , HM Revenue & Customs (UK and Channel Islands)*
- EEA national ID card (must be valid at time of application)
- Irish passport card (cannot be used with an Irish passport; must be valid at time of application)
- cards carrying the PASS accreditation logo (UK, Isle of Man and Channel Islands; must be valid at time of the application)
- letter from Head or College Principal (UK; for 16-19 year olds in full-time education. This is only used in exceptional circumstances if other documents cannot be provided; must be valid at time of application).

Note

If a document in the list of valid identity documents is:
denoted with * - it should be less than three months old
denoted with ** - it should be less than 12 months old