Safer Recruitment Policy

This policy applies to the whole school including Boarding and the Early Years. The current version of any policy, procedure, protocol or guideline is the version held on the TASIS England website. It is the responsibility of all staff to ensure that they are following the current version.

Information Sharing Category	Public Domain
TASIS England Document reference (Org, Doc, version, date)	TASIS_SRP_V7.6_01092026
Version	7.6
Date published	14 September 2026
Date ratified by Head of School	01 September 2026
Review/Update date	01 September 2027
Responsible area	Director of Human Resources

Agreed by:

Head of School	**Chair of the Board**
Bryan Nixon	David King
01 September 2026	01 September 2026

1 Introduction

TASIS England 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. TASIS England is also committed to providing a supportive and flexible working environment to all its members of staff. TASIS England 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.

For the purposes of this policy, the term "staff" may be used interchangeably and refers to, and includes, all TASIS England employees, bank staff, volunteers or externally contracted staff. Work experience and placement students are not "staff" for the purposes of this policy and are dealt with separately below.

The aims of the school's safer 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, ethnic or national origin, religion or religious belief, 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 School Standards) Regulations 2014 (**ISSRs**);
    - the statutory guidance published by the Department for Education (**DfE**), *Keeping Children Safe in Education* (September 2026) (**KCSIE**);
    - disqualification under the Childcare Act 2006 ***(DUCA);***
    - the Prevent Duty Guidance for England and Wales (**Prevent Duty Guidance**);
    - the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026;
    - the Early Years Foundation Stage statutory framework for group and school-based providers (September 2026) (EYFS); and
    - any guidance or code of practice published by the Disclosure and Barring Service (**DBS**).
- to ensure that the school 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 familiarizing themselves with and complying with the provisions of this policy.

2 Core Compliance Framework

The following statements summarize the minimum safer-recruitment requirements that apply to *all* appointments at TASIS England. These form the school's core compliance framework in line with Keeping Children Safe in Education (2026), the Crime and Policing Act 2026 and the Independent School Standards Regulations (2014).

- **Safer-recruitment training:** All staff involved in recruiting to roles that work with children have completed accredited safer-recruitment training.

- **Advertising:** All job adverts include the school's safeguarding commitment; confirmation that pre-employment checks will be undertaken; the safeguarding duties of the role; and whether the post is exempt from the Rehabilitation of Offenders Act 1974.
- **Application forms:** State that it is an offence to apply for a role involving regulated activity if the applicant is barred and refer to the school's policies on Safeguarding Children & Child Protection Policy and the recruitment of ex-offenders.
- **Shortlisting and self-declaration:** Shortlisted candidates complete a self-declaration covering criminal history, barred-list or prohibition status, relevant overseas offences, and (where applicable) childcare-disqualification status.
- **Online searches:** The school may complete proportionate open-source online checks on shortlisted candidates (public-domain only) as part of due diligence.
- **References:** Two references are obtained - one from the current or most recent employer - and verified directly. Open or candidate-provided references are not accepted.
- **Pre-appointment checks:** Employment remains conditional until satisfactory completion of all required checks (identity, right to work, enhanced DBS and barred-list, prohibition from teaching, section 128, qualifications, references, overseas checks/letter of professional standing, and medical fitness). All checks are recorded on the Single Central Record (SCR). DBS certificates are not retained for more than six months; right-to-work evidence is kept for the duration of employment + two years.
- **Volunteers:** No unchecked volunteer is left unsupervised or permitted to work in regulated activity. Following the Crime and Policing Act 2026 the "supervision exemption" no longer applies, so an enhanced DBS check with barred-list information is obtained for every volunteer who teaches, trains, instructs, cares for or supervises children frequently, on more than three days in a 30-day period, or overnight. An audit is completed for volunteers to determine what level of check (if any) is appropriate.
- **Contractors and agency staff:** Written confirmation of completed checks is obtained before work begins, and identity is verified on arrival.
- **Board members / Proprietors:** All proprietors and governing Board members have an enhanced DBS (with barred list if in regulated activity), section 128 (where applicable), right-to-work, and overseas checks (if relevant). The enhanced DBS and identity checks for the chair of the proprietor body are carried out by the Secretary of State.
- **DBS referrals:** The school refers to the DBS any individual who has harmed or poses a risk of harm to a child, or who would have been removed from regulated activity if they had not left the school's employment. Where applicable, referrals to the Teaching Regulation Agency will also be made.

This section provides the school's mandatory minimum standard. The detailed operational procedures that follow (Sections 3–14) explain how each requirement is implemented.

3 Data protection

TASIS England 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 school to enable TASIS England to carry out the checks that are applicable to their role. The school will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and other relevant parties. Failure to provide requested information may result in the school not being able to meet its employment, safeguarding or legal obligations. TASIS

England will process personal information in accordance with its Staff Privacy Notice and Data Protection and Confidentiality and Information Sharing Policies.

4 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. As part of our commitment to safeguarding, the school may carry out proportionate online searches on shortlisted candidates in line with KCSIE 2026. These searches are limited to publicly available information (for example, internet and social media content). Where relevant information is identified, this may be discussed with the candidate before any decision is made (see section 6 for more information).

Incomplete application forms will be returned to the applicant where the application deadline has not passed. Should there be any gaps in academic or employment history, a satisfactory explanation must be provided. A curriculum vitae will not be accepted in place of the completed application form.

Applicants will receive a job description and person specification for the role applied for. This policy and the school's safeguarding and child protection policy and procedures are available to download from official TASIS England website. These can be printed and forwarded to applicants on request.

The school 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' interview will include relevant safeguarding questions to assess the applicant's suitability to work with children

Students will be involved in the recruitment process in a meaningful way where it is appropriate to the role. This may include observing shortlisted candidates in appropriately supervised interaction with students. All information considered in reaching a decision, including any contribution from students, will be recorded together with the decision made.

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 school 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 school'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 school 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 school being satisfied that any information generated through online searches does not make the applicant unsuitable to work at the school;
- the receipt of two references (one of which must be from the applicant's most recent employer) which the school 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 school;
- 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 TASIS England;
- where the position amounts to "regulated activity (see section 6.4.2 below) the receipt of an enhanced disclosure from the DBS which the school considers to be satisfactory;
- where the position amounts to "regulated activity" (see section 6.4.2 below) 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 school;
- 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 school;
- confirmation that the applicant is not disqualified from acting as a trustee / Board member or senior manager of a charity under the Charities Act 2011 (if applicable, see section 6.7 below);
- confirmation that the applicant is not disqualified from working in connection with early or later years provision (if applicable, see section 6.8 below);
- verification of the applicant's medical fitness for the role (see section 6.9 below);
- verification of the applicant's right to work in the UK; and
- any further checks which the school 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.

***TASIS England is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". TASIS England is required to carry out an enhanced DBS check for all staff, supply staff and Board members who will be engaging in regulated activity. However, the school 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. In addition, as an independent school, TASIS England must obtain an enhanced criminal record certificate for any member of staff who will not be engaging in regulated activity but who works regularly at the school. This is required by paragraph 18(2)(d) of the Schedule to the Education (Independent School Standards) Regulations 2014, read with regulation 2(5)(b). It is a duty, not a discretion.**

Whether a position amounts to "regulated activity" must therefore be considered by the school in order to decide which checks are appropriate. It is however likely that in nearly all cases TASIS England will be able to carry out an enhanced DBS check and a Children's Barred List check.

5 Artificial intelligence

TASIS England 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.

6 Pre-employment checks

In accordance with the recommendations set out in KCSIE 2026, DUCA and the requirements of the ISSRs and the National Minimum Standards for Boarding Schools (May 2026) the school carries out a number of pre-employment checks in respect of all prospective staff.

6.1 **Online searches**

In addition to the checks set out below, TASIS England 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 school. In accordance with paragraph 301 of KCSIE 2026, the school will consider carrying out an online search as part of its due diligence on shortlisted candidates. Any online searches the school carries out may include searches of internet search engines, websites and publicly available social media or professional networking content. Shortlisted candidates will be informed that online searches may be undertaken.

Online searches, where carried out, will normally be undertaken as part of the shortlisting process and before interview. The school will not carry out online searches as part of its initial sift of applications.

The school will determine how it approaches online searches on a case-by-case basis. However, shortlisted candidates will be treated consistently with regard to online searches.

Where online searches include social media or professional networking profiles, the searches will be undertaken by a person who will play no part in the appointment decision. Wherever possible, that person will also play no other part in the recruitment process, including the shortlisting exercise. In carrying out online searches the school is looking for 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 school or in an education setting; and/or
- is of a safeguarding nature.

Any relevant information identified through online searches will be entered in an 'Online Search Results Record'. Relevant information will be provided to the interview panel for discussion with the shortlisted applicant at interview. Information obtained through an online search will not, by itself, determine an applicant's suitability for appointment.

In evaluating any online information for relevance, the school 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 school or in an education setting;
- whether the information calls into doubt the applicant's willingness or ability to uphold the school'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;
- whether any information was identified that may have an impact on the reputation of the School (whether positive or negative); and
- the relevant circumstances and the explanation(s) offered by the applicant.

Information identified through online searches will not be retained for longer than is necessary. The school may retain a record that the search was completed, any relevant matters considered, the applicant's response and the recruitment decision, in accordance with its Information and Records Retention Policy. Other information obtained through the search will be securely destroyed when it is no longer required.

6.2 **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 school 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 school 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 follow the DBS identity checking guidelines for standard and enhanced checks in force from 22 April 2025, as updated; those guidelines are the authoritative source and take precedence over Appendix 1 in the event of any difference):

- the documents required by the applicable route (Route 1, Route 2 or Route 3) under the current DBS ID checking guidelines; and
- such further documents as those guidelines require for the applicable route. The combination of documents must establish the applicant's name and date of birth. The requirement for one of the Route 1 documents to verify the applicant's current address has been removed; applicants must still provide their current address and five-year address history on the DBS application, and where a certified digital identity service is used, that service's own address verification requirements apply.

A UK birth certificate is required as part of the Route 3 document set. Identity may alternatively be verified through a certified digital identity service provider where the school chooses to use one.

Where an applicant claims to 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.

TASIS England asks for the date of birth of all applicants in order to verify identity and check for any unexplained discrepancies in the employment and education history. TASIS England 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 school will check evidence of your right to work in the UK in accordance with the Home Office 'Code of practice on preventing illegal working: Right to Work Scheme for employers, 13 February 2024 (as updated)' (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 school requests.

Retention of records: the school 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. Details of the documents used to verify identity for DBS purposes are retained for two years, in line with the DBS identity checking guidelines.

6.3 **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 TASIS England. One of the references must be from the applicant's current employer. Where the applicant is not currently employed, TASIS England will obtain verification of the applicant's most recent relevant period of employment. Where the applicant is not currently working with children, a reference will also be secured from the employer with whom the applicant last worked with children; where the applicant has never worked with children, a reference will be obtained from their current employer. 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 10 below); and

  (*questions about health or sickness records will only be included in reference requests sent out after the offer of employment has been made).

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 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 school. 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.

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

TASIS England 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 must be countersigned by the Head of that school.

All internal candidates who apply for a new role at TASIS England 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 school will be the most recent employer and will previously have taken up references from past employers.

6.4 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 school.

6.4.1 DBS filtering rules

With effect from 29 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 take into account a conviction or caution that should not have been disclosed. If a protected conviction or caution is inadvertently disclosed to the school 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.

As updated from time to time by the DBS, the filtering rules work as follows:

Filtering applies only to convictions and cautions which are spent. All unspent convictions and unspent conditional cautions are disclosed on a standard or enhanced certificate regardless of the periods set out below.

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 youth caution, reprimand or warning issued 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). This exception does not extend to youth conditional cautions, which are disclosed until they are spent under the Rehabilitation of Offenders Act 1974.

All convictions resulting in a custodial sentence, whether or not suspended, will always be disclosed. The filtering rules are those in the DBS filtering guide (28 October 2023, as amended). That guide is the authoritative source and should be consulted in any case of doubt; the summary in this section is provided for convenience only.

6.4.2 **Regulated activity**

TASIS England 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 school 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 school 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 on more than three days in any 30-day period; and

(d) provides the opportunity for contact with children.

For the avoidance of doubt, the opportunity for contact with children at (d) above is a condition of the second statutory limb only, namely other paid work in a specified place. Work involving teaching, training, instructing, caring for or supervising children is regulated activity where the frequency or period conditions are met, whether or not the condition at (d) is also satisfied. The description of frequency at (a) as once a week or more is taken from Disclosure and Barring Service guidance on regulated activity; KCSIE 2026 expresses the test as frequently, on more than three days in a 30-day period, or overnight.

The Crime and Policing Act 2026 removed the "supervision exemption" from regulated activity with effect from 1 September 2026. Roles carried out on an unpaid / voluntary basis will therefore amount to regulated activity if the above conditions are met, regardless of whether they are supervised. Any person volunteering at TASIS England in a role which involves teaching, training, instructing, caring for or supervising children frequently, on more than three days in a 30-day period, or overnight is in regulated activity.

The full legal definition is set out in Schedule 4 to the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026. Regulated activity comprises (i) paid or unpaid work involving teaching, training, instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children; and (ii) any other

paid work in a specified place (which includes a school) which gives the opportunity for contact with children. Work under (i) or (ii) is regulated activity only where the frequency or period conditions above are met.

Certain activities are always regulated activity regardless of how often they are carried out. These are relevant personal care (including assisting a child with eating and drinking for reasons of illness or disability, or in connection with toileting, washing, bathing or dressing for reasons of age, illness or disability) and health care provided by, or under the direction or supervision of, a regulated health care professional. Paid work in a specified place which is occasional and temporary and does not involve any of the activities at (i) above is not regulated activity.

It is for TASIS England to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances. However, nearly all posts at the school amount to regulated activity. Limited exceptions could include an administrative post undertaken on a temporary basis in the school office outside of term time.

6.4.3 **The DBS disclosure certificate**

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to the school. It is a condition of employment with the school that the **original** disclosure certificate is provided to TASIS England 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 TASIS England should be arranged with the HR Department as soon as it has been received. Applicants who are unable to attend at the school to provide the certificate are required to send a certified copy by post or email within two weeks of the original disclosure certificate being received. Certified copies must be sent to Director of Human Resources. Where a certified copy is sent, the original disclosure certificate must still be provided no later than the first working day.

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

6.4.4 **Starting work pending receipt of the DBS disclosure**

If there is a delay in receiving a DBS disclosure the Head of School 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.

In accordance with paragraph 3.17 of the Early Years Foundation Stage statutory framework (September 2026), this discretion does not apply to the school's Early Years provision. No person may begin working or volunteering in Early Years provision until the school has received an enhanced DBS certificate which it considers satisfactory together with a clear Children's Barred List check.

For this purpose, the school's Early Years provision comprises PreK and Kindergarten. The restriction applies to PreK and Kindergarten teachers and teaching assistants, substitute teachers covering those classes, parent volunteers working with those classes, recess supervisors working with PreK and Kindergarten students, the Head and Deputy Head of PreK to Grade 8 where they hold Early Years responsibility, and the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads where they hold Early Years responsibility. The Director of Human Resources is responsible for confirming that the enhanced DBS certificate and Children's Barred List check have been received before any such person begins work.

6.4.5 **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. TASIS England will take into account 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 TASIS England. 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.

TASIS England'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;
- from each overseas country in which the applicant has lived including their country of origin.

When requesting such information TASIS England 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.

TASIS England 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 TASIS England 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, TASIS England 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 school 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 school. However, the school will take all relevant information into account in determining whether an applicant is suitable to work at the school.

The school 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 of the information that has been obtained during the recruitment process. Unless expressly waived by the school, continued employment will remain conditional upon TASIS England being provided with the outcome of the formal check and it being considered satisfactory.

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

6.5 **Prohibition from teaching check**

TASIS England is required to check whether staff who carry out "teaching work" are prohibited from doing so. The school uses the DfE’s Check a teacher’s record service 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, TASIS England 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 school will consider whether the facts of the case render the applicant unsuitable to work at TASIS England.

TASIS England 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 Head of School. 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.

6.6 **Prohibition from management check**

TASIS England 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 school (a **section 128 direction**).

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

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

- Head of School;
- teaching posts on the senior leadership team;
- teaching posts which carry a departmental head role, where the facts indicate that the post involves participation in the management of the school; and
- support staff posts on the senior leadership team.

Whether a post constitutes "management" is a question of fact in each case. Department for Education guidance on the Independent School Standards states that roles involving, or likely to involve, management of a school include head teachers, principals, deputy and assistant head teachers, governors and trustees, and that other teaching posts carrying additional responsibilities do not of themselves amount to taking part in management. For non-teaching staff, only posts on the senior leadership team or roles on the proprietor body are regarded as management for this purpose.

The school 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 school obtains for all posts at the school that amount to regulated activity). It can also be obtained through the government list of individuals prohibited from managing or governing schools. TASIS England will use either, or both, methods to obtain this information.

In addition, TASIS England 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 school.

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, TASIS England will consider whether the facts of the case render the applicant unsuitable to work at the school.

6.7 Disqualification from acting as a charity trustee or senior manager

6.7.1 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.

6.7.2 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 school the trustees will typically be the Board of Governors/Directors of the school.

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 TASIS England the disqualification rules will be applicable to all Board members, the Head of School, Bursar and potentially other senior staff who report directly to the Board.

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

6.7.3 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 school's attention may result in the termination of an appointment as a Board member 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 school if there is a change in their circumstances that results or may result in them becoming disqualified from acting as a Board member or senior manager.

6.7.4 Checks by the school

To ensure that it has accurate and up to date information the school will also check the following registers in respect of each Board member 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.

6.7.5 **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.

TASIS England 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 school is under no obligation to await the outcome of a Charity Commission waiver application before taking such action.

6.8 **Childcare disqualification**

The Childcare Act 2006 (**Act**) and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (**Regulations**) state that it is an offence for the school to employ anyone in connection with our early years provision (**EYP**) or later years provision (**LYP**) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP.

6.8.1 **Definitions**

(a) EYP includes usual school activities and any other supervised activity for a child up to 1 September after the child's 5th birthday, which takes place on the school premises during or outside of the normal school day; and

(b) LYP includes provision for children not in EYP and under the age of 8 which takes place on school premises outside of the normal school day, including, for example breakfast clubs, after school clubs and holiday clubs. It does not include extended school hours for co-curricular activities such as sports activities.

DUCA states that only those individuals who are employed directly to provide childcare are covered by the Regulations. "Childcare" means any form of care for a child, which includes education and any other supervised activity for a child who is aged 5 or under. "Childcare" in LYP does not include education during school hours but does cover before and after school clubs.

6.8.2 **Relevant roles**

Roles which will be covered by the Regulations are teaching and teaching assistant positions in EYP, and those which involve the supervision of under 8s in LYP. Those who are directly involved in the management of EYP and LYP include the Head of School and may also include other members of the leadership team as well as those involved in the day-to-day management of EYP or LYP at the school.

DUCA contains an express statement that cleaners, drivers, transport escorts, catering and office staff are not covered by the Regulations.

Some roles at the school may involve the provision of childcare in EYP or LYP on an occasional basis. They will not automatically be within the scope of the Regulations, and the school will therefore consider whether they do on a case-by-case basis. The Regulations only apply to a limited number of roles within the school but do extend beyond employees to Board members and volunteers who carry out relevant work in EYP or LYP.

6.8.3 **Grounds for disqualification**

The grounds on which a person will be disqualified from working in connection with EYP or LYP are set out in the Regulations. They are not only that a person is barred from working with children (by inclusion on the Children's Barred List) but also include:

(a) having been cautioned (after 6 April 2007) for, or convicted of, certain criminal offences including violent and sexual criminal offences against children and adults whether committed in the United Kingdom or overseas;

(b) various grounds relating to the care of children, including where an order is made in respect of a child under the person's care;

(c) having been refused registration for the provision of childcare (including nurseries, day care and child minding or other childcare), having been disqualified from any such registration or having had that registration cancelled;

(d) having been refused an application for registration of a children's home or having had any such registration cancelled; or

(e) having been prohibited, restricted or disqualified from private fostering.

6.8.4 **Self-declaration form**

All applicants to whom an offer of employment is made to carry out a relevant role in EYP or LYP will be required to complete a self-declaration form confirming whether they meet any of the criteria for disqualification under the Regulations.

TASIS England will decide whether a role is relevant and within the scope of EYP or LYP by having regard to the guidance in DUCA. Employment with the school in any relevant role will be conditional upon completion of the self-declaration form and upon the applicant not being disqualified.

TASIS England cannot permit any person who is currently disqualified to start work in a relevant role. The school also reserves the right at its absolute discretion to withdraw an offer of employment if, in the opinion of the school, any information disclosed in the self-declaration form renders that person unsuitable to work at the school.

Applicants who have any criminal records information to disclose about themselves must also provide the following information:

(a) details of the order, restriction, conviction or caution and the date that this was made;

(b) the relevant court or body and the sentence, if any, which was imposed; and

(c) a copy of the relevant order or conviction.

Applicants are not required to disclose a caution or conviction for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules (see section 6.4.1 above).

For the avoidance of doubt the school does not require applicants to request any criminal records information directly from the DBS. The school only requires applicants to provide relevant information about themselves "to the best of their knowledge".

6.8.5 **Waiver of a disqualification**

A person who discloses information which appears to disqualify them from working in a relevant role may apply to Ofsted for a waiver of the disqualification. TASIS England may withdraw an offer of employment at its absolute discretion and is under no obligation to await the outcome of an Ofsted waiver application. If a waiver application is rejected the school will withdraw the conditional offer of employment.

6.8.6 **Retention of disqualification information**

TASIS England will securely destroy any information which is provided by an applicant which is not relevant to the childcare disqualification requirements as soon as it is established that it is not relevant. Where a person appointed

to a role at the school is found to be disqualified the school will retain any relevant information only for the period it takes for a waiver application to be heard and the decision communicated to the school, after which it will be securely destroyed.

6.8.7 **Continuing duty to disclose change in circumstances**

After making this declaration staff in a relevant role are under an on-going duty to inform the school if their circumstances change in a way which would mean they subsequently meet any of the criteria for disqualification. Any failure to disclose relevant information now, or of a future change in circumstances, will be treated as a serious disciplinary matter and may lead to the withdrawal of a job offer or dismissal for gross misconduct.

In addition, from 1 September 2026 the Early Years Foundation Stage statutory framework requires staff and prospective staff in Early Years provision to disclose any information that may affect their suitability to work with children, including arrests and charges as well as cautions, convictions, court orders, reprimands and warnings. The duty applies to individuals who have not yet begun working at the school as well as to those already in post. Application forms, and pre-employment paperwork require the widened disclosure duty.

6.9 **Medical fitness**

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

It is TASIS England's practice that all applicants to whom an offer of employment is made must complete a Health Questionnaire. TASIS England will arrange for the information contained in the Health Questionnaire to be reviewed by the school's medical advisor. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e., proposed timetable, extra- curricular activities, layout of the school etc. If the school's medical advisor has any doubts about an applicant's fitness the school will consider reasonable adjustments in consultation with the applicant. TASIS England may also seek a further medical opinion from a specialist or request that the applicant undertakes a full medical assessment.

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 school instead, or to attend an occupational health assessment to consider their fitness for the role, they should contact the Director of Human Resources so that appropriate arrangements can be made.

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

6.10 **Single central record**

The single central record is the register of pre-appointment checks that the school is required by law to keep. It is referred to in the Education (Independent School Standards) Regulations 2014 as "the register" and is commonly known as the single central record, or SCR. It is a record that the required checks have been carried out and when, rather than a store of the underlying documents, which are held separately and retained in accordance with the school's retention schedule.

The record covers all staff who work at the school, including teacher trainees on salaried routes and agency and third-party supply staff even where they work for a single day, and, as an independent school, all members of the proprietor body.

For each person the record indicates whether the following checks have been carried out or certificates obtained, and the date on which each was completed or obtained:

- verification of identity;

- verification of medical fitness for the role;
- a separate Children's Barred List check;
- an enhanced DBS check with Children's Barred List information requested and the certificate provided;
- a prohibition from teaching check;
- a check to establish whether the person is disqualified from working in connection with early or later years provision for children under the age of eight;
- a minimum of two references (one of which must be from the applicant's most recent employer and/or the most recent employer for whom they have worked with children;
- further checks on people who have lived or worked outside the UK;
- a check of professional qualifications, where required, or otherwise cited in support of the person's application; and
- a check to establish the person's right to work in the United Kingdom.

As an independent school, TASIS England also records details of the section 128 checks undertaken for those in management positions, and the date the check was completed.

For agency and third-party supply staff the record shows whether written confirmation has been received that the employment business has carried out the relevant checks and obtained the appropriate certificates, the date that confirmation was received, and whether details of any enhanced DBS certificate with a check of the Children's Barred List have been provided.

The school also records information it is free, but not required, to record, including checks made on volunteers and on Board Members, and the name of the person who carried out each check.

An individual's details are removed from the single central record once they no longer work at the school. The record is kept in electronic form, as a spreadsheet, and is available for inspection.

The Independent School Standards place responsibility for the single central record on the proprietor. The Board discharges that responsibility through the Head of School, who owns the record. The Director of Human Resources maintains it and is responsible for ensuring that entries are made accurately and without delay. The Head of School and the Chair of the Board carry out a check of the record four times a year, and the outcome of each check is recorded and shared with the Designated Safeguarding Lead.

7 Contractors and agency staff

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

Agencies who supply staff to TASIS England must also complete the pre-employment checks which the school would otherwise complete for its staff. Again, the school requires confirmation that these checks have been completed before an individual can commence work at the school.

For agency and third-party supplied staff, the written notification must confirm that an enhanced DBS certificate has been obtained by the employment business or another such business, and, where the position requires it, that a Children's Barred List check was obtained before the individual was appointed. Where the certificate disclosed any matter or information, or any information was provided to the employment business, TASIS England will obtain a copy of the certificate from the agency.

In addition, as an independent school, TASIS England must comply with paragraph 19 of the Schedule to the Education (Independent School Standards) Regulations 2014. The evidence provided by the employment business must be specific to each named individual and not a general statement that checks have been carried out.

No supply worker may start work until the school has received that information together with any required enhanced DBS certificate, which must be no more than three months old when the person starts work or, where the worker is registered with the DBS Update Service, sight of the original enhanced DBS certificate and confirmation that a satisfactory check of the DBS Update Service has been completed; the school will also ensure that any required separate Children's Barred List check has been completed before the individual commences work.. Where a supply worker is living or has lived outside the UK and an enhanced certificate is not sufficient to establish suitability, the person may not start work unless the school has received written notification from the employment business that appropriate further checks have been made, having regard to KCSIE.

For contractors, the school will ensure that the appropriate level of DBS check has been obtained: enhanced with Children's Barred List information where the contractor engages in regulated activity; enhanced without barred list information where the work provides an opportunity for regular contact with children; and otherwise the school will consider whether a basic DBS check is appropriate.

Under no circumstances will a contractor on whom no checks have been obtained be permitted to work unsupervised or to engage in regulated activity. Where an individual working at the school is self-employed, the school will either obtain the DBS check itself or require sight of the certificate at the level the school requires. TASIS England will independently verify the identity of individuals supplied by contractors or an agency in accordance with section 6.2 above and will check that the person presenting themselves for work is the same person on whom the checks have been made.

8 Volunteers

TASIS England 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 school (the definition of regulated activity set out in section 6.4.2 above will be applied to all volunteers).

Supervision no longer removes a volunteer from regulated activity. Where a volunteer is not in regulated activity, TASIS England will undertake and record a written risk assessment to decide what level of check is appropriate. The risk assessment will consider the nature of any work with children; what the school 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 an enhanced DBS check without Children's Barred List information (for volunteers who would be in regulated activity but do not volunteer frequently enough) or a basic DBS check (for any other volunteer who may have access to children) is appropriate.

Under no circumstances will the school permit an unchecked volunteer to have unsupervised contact with students.
Where an existing volunteer comes within regulated activity from 1 September 2026 as a result of the changes made by the Crime and Policing Act 2026, the school will check their Children's Barred List status by obtaining an enhanced DBS check with Children's Barred List information. A standalone Children's Barred List check may be obtained where the school wishes to allow the volunteer to undertake regulated activity before the enhanced DBS certificate is received, or where an enhanced DBS check without Children's Barred List information has recently been obtained and there has been no break in service since that certificate was issued.

The Director of Human Resources owns the audit of all existing volunteers against the revised definition of regulated activity. From 1 September 2026 the school will obtain a standalone Children's Barred List check for any existing volunteer identified as coming within regulated activity, so that they may continue while the enhanced DBS certificate is awaited. Any volunteer who has not been checked will not work in regulated activity in the meantime. The audit and the associated enhanced DBS applications will be completed by 30 September 2026.

Checks made on volunteers do not form part of the statutory minimum content of the single central record. KCSIE 2026 paragraph 350 lists them among the information schools are free to record. The method of recording the outcome of the audit is therefore a matter for the school.

It is the school's policy that a new enhanced DBS certificate with Children's Barred List information is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the school for three consecutive months or more. Those volunteers who are likely to be involved in activities with the school on a regular basis may be required to sign up to the DBS Update Service (at the point an application for a new DBS check is made, or within 30 calendar days of the issue date on the certificate) as this permits the school to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition, the school 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;
- references from the volunteer's place of work or any other relevant source; and
- an informal safer recruitment interview.

9 Work Experience and Placements

Off-site placements arranged by the school: Where a student undertakes an off-site work experience placement arranged by the school, the school will satisfy itself that the placement provider has appropriate safeguarding policies and procedures in place to protect children from harm. The school will consider whether individuals involved in the placement are undertaking regulated activity. A person providing teaching, training, instruction, care or supervision to a student may be engaging in regulated activity where this is carried out on more than three days in any 30-day period, or overnight. A person who is barred from regulated activity must not undertake such activity.

The school will not require a placement provider to obtain an enhanced DBS check with Children's Barred List information for individuals who are not involved in teaching, training, instructing or caring for or supervising the student, as such activitydoes not constitute regulated activity.

Students undertaking placements at TASIS England: Where a student aged 16 or over undertakes a placement at TASIS England which provides an opportunity for contact with children, the school will assess whether that activity constitutes regulated activity and, where appropriate, whether an enhanced DBS check should be obtained.

10 Board of Governors (Proprietary Board of Directors)

Before an individual becomes the chair of the body of people which is the proprietor of TASIS England, the Secretary of State will carry out an enhanced DBS check and, where such a check is made, obtain the enhanced DBS certificate; confirm the individual's identity; and, where the individual lives or has lived outside the UK and an enhanced check is insufficient, make such other checks as the Secretary of State considers appropriate.

All proprietors, trustees, local Board members and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008)
- Section 128 checks are only required for local Board members if they have retained or been delegated any management responsibilities
- Identity

- Right to work in the UK, and
- Other checks deemed necessary if they have lived or worked outside the UK.

These checks are required by paragraph 20 of the Schedule to the Education (Independent School Standards) Regulations 2014, which expressly includes a right to work check for the chair of a proprietor body and for the other members of that body. They are therefore retained and are not optional.

11 Visiting speakers and the Prevent Duty

The Prevent Duty Guidance requires the school to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by students, are suitable and appropriately supervised. Visiting speakers are not left unsupervised with students.

TASIS England 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 school or perform any other regular duties for or on behalf of the school.

All visiting speakers will be subject to the school's Security Policy and Visiting Speaker Risk Assessment. This will include signing in and out at Security Reception, the wearing of a visitor's lanyard at all times and being escorted by a fully vetted member of staff between appointments.

TASIS England 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 school. In doing so TASIS England will always have regard to the Security Policy, the Visiting Speaker Protocol, the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE 2026 which states:

"*Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs"*

In fulfilling its Prevent Duty obligations the school 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.

12 Policy on recruitment of ex-offenders

12.1 Background

TASIS England will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. The school makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the school. Each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph 11.2 below.

All positions within the school 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 (see section 6.4.1 above).

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 school 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 school. TASIS England 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.

12.2 **Assessment criteria**

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, TASIS England 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 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; 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 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 within the last ten years.

12.3 **Assessment procedure**

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, TASIS England will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Director of Human Resources and the Head of School 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 school 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.

12.4 **Retention and security of disclosure information**

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

13 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 school's policies (including the Whistleblowing Policy, the Safeguarding Children and Child Protection Policy and the Faculty and Staff Behaviour Policy (Code of Conduct).

All staff receive training so that they understand the school's expectations. Safeguarding children is at the centre of the school's culture and is accordingly considered formally during staff performance development reviews and appraisal and finally at an exit interview which is offered to all leavers.

14 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 school has legal responsibilities to fulfil when employment comes to an end. In particular, the school has a legal duty to make a referral to the DBS where:

- an individual has applied for a position at the school despite being barred from working with children;
- an individual has been removed by the school 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;
- we believe the individual has engaged in relevant conduct; or
- we believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009.

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 school will make a referral to the Teaching Regulation Agency.

The Teaching Regulation Agency will consider whether to impose a prohibition from teaching order. The Children's Wellbeing and Schools Act 2026 makes further provision on teacher misconduct and on the regulation of independent educational institutions. Those provisions are not yet commenced and are therefore not reflected in this policy. Review on commencement.

15 Boarding: other residents, educational guardians and lodgings

TASIS England provides boarding accommodation. The requirements of the National Minimum Standards for Boarding Schools (May 2026) relating to members of staff households and other persons aged 16 and over living on the same premises as boarders (Standards 19.2, 19.3 and 19.4) are set out in the school's Living Within a Resident Household Policy. That policy covers the enhanced DBS certificate with a check of the Children's Barred List required before occupation, the written agreement and declaration required of every resident aged 16 and over, safeguarding induction, the supervision of guests, and the supervision of outside delivery and maintenance personnel. This section deals with the matters that policy does not cover.

Educational guardians. The school does not appoint educational guardians. If the school were to appoint one, the guardian would be subject to the same safer recruitment procedures as staff. This applies where a guardian is appointed for a boarder under 18 by the school, by a member of staff as part of their work for the school, or by an agency or organisation acting on

the school's behalf. Under no circumstances will a member of school staff be appointed as an educational guardian for a boarder (Standards 22.1 and 22.5).

Where a parent or carer appoints an educational guardian, the school remains under a duty to take appropriate steps to satisfy itself that the arrangement promotes the welfare and the physical and emotional wellbeing of the boarder, and to act immediately on any concern about a guardianship arrangement, referring it to the relevant agencies (Standards 22.3 and 22.4). Those arrangements are dealt with in the school's boarding documentation and are not a safer recruitment matter.

Lodgings and host families. The school does not arrange lodgings or host family placements for boarders, and it makes clear to parents and carers that any such arrangement is theirs rather than the school's (Standard 23.1). If the school were to arrange lodgings, it would visit them, interview any adult responsible for the accommodation of students there, take up references and record a satisfactory assessment before any boarder was placed. Unless the host family were in a family relationship with the boarder, the school would obtain an enhanced DBS check with a check of the Children's Barred List, with satisfactory outcomes known, for all members of the host family aged 16 and over who would be living at the lodgings while the boarder was staying, and all adults providing lodgings on the school's behalf would undergo suitable safeguarding training at least every three years (Standards 23.4 and 23.5).

16 Queries

If an applicant has any queries on how to apply for a post at TASIS England they should contact the Director of Human Resources or the Head of School.

Appendix 1 Identity checking requirements

Identity must be verified in accordance with the DBS identity checking guidelines for Standard and Enhanced DBS check applications in force at the date of the check, published on GOV.UK. Those guidelines set out the Route 1, Route 2 and Route 3 document combinations, the groups into which acceptable documents fall, the validity periods applying to individual documents, and the circumstances in which a certified digital identity service provider may be used instead.

The document lists are amended by the DBS from time to time and are not reproduced in this policy. HR must use the current published guidelines at the date of each check. Details of the documents used to verify identity are retained for a minimum of two years, or for such longer period as the guidelines require.

HR reviews the identity requirements annually, together with the invitation to interview letters issued to candidates, to confirm that they reflect the current DBS guidelines. When assessing the documents an applicant provides, HR refers to the three document groups set out in those guidelines. Verification of identity is carried out separately from, and in addition to, the check on the applicant's right to work in the United Kingdom.

https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-standardenhanced-dbs-check-applications-from-22-april-2025