



# HARRODIAN

## **Safer Recruitment Policy**

### **1. Introduction**

The Harrodian School is committed to providing the best possible care and education for its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment for all its members of staff. The School 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 School'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, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DFE), Keeping Children Safe in Education (September 2016) (KCSIE), the Prevent Duty Guidance for England and Wales 2015 Disqualification Under the Childcare Act 2006 (DUCA) 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 familiarising themselves with, and complying with, the provisions of this policy.

## 2. 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. The School will only consider candidates who have completed the application form in full. Incomplete application forms will be returned to the applicant where the deadline for completed application forms 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 but may be submitted in addition to the completed application form.

Applicants will receive a job description and person specification for the role applied for. Application forms, job descriptions, person specifications and the School's Safeguarding and Safer Recruitment Policies are available to download from the School's website.

The applicant may then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail. Candidates will also be asked questions relating to child protection at interview to ascertain the level of their knowledge and the suitability of their answers. It is recognised that not all interviewees will have had Child Protection experience within Schools. In such cases, questions will be adapted to test applicants' responses to hypothetical safeguarding scenarios. At least one member of every appointment panel will have received safer recruitment training. In addition, any member of staff responsible for assessing pre-employment checks will have received the relevant training.

If it is decided 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;
- a pre-employment immigration check (the necessary documents that must be shown before any employment may start) confirming the right to work in the UK;
- verification of the applicant's identity (where that has not previously been verified);
- 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":
  - i. information about whether the applicant is, or has ever been, the subject of a sanction, restriction or prohibition issued by the National College for Teaching and Leadership (NCTL), or any predecessor or successor body, or by a regulator of the teaching profession in any other European Economic Area country which prevents them from working at the School or which, in the School's opinion, renders them unsuitable to work at the School; \*\*
  - ii. information about whether the applicant is, or has ever been, the subject of any proceedings before a professional conduct panel in the UK or an equivalent body in any other country for any reason which prevents them from working at the School or which, in the School's opinion, renders them unsuitable to work at the School;
- where the position amounts to "regulated activity (see paragraph 4.3 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 paragraph 4.3 below) confirmation that the applicant is not named on the Children's Barred List\*;
- information about whether the applicant is, or has ever been, subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies or restricts them from providing education at a school, taking part in the management of an independent school or working in a position which involves regular contact with children or which otherwise, in the School's opinion, renders them unsuitable to work at the School;
- for management positions:
  - i. information about whether the applicant is, or has ever been, the subject of 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 or which otherwise, in the School's opinion, renders them unsuitable to work at the School; \*\* and
  - ii. information about whether the applicant is, or has ever been, the subject of a referral to, or proceedings before, the Department for Education or other appropriate authority where consideration was given to imposing a direction under section 128 of the Education and Skills Act 2008 which, in the School's opinion, renders them unsuitable to work at the School;
- confirmation, where applicable, that the applicant is not disqualified from working in connection with early or later years provision
- verification of the applicant's medical fitness for the role (see section 3 below);
- verification of the applicant's right to work in the UK;
- any further checks that the School deems appropriate as a result of the applicant having lived or worked outside of the UK (see section 4 below); and
- verification of professional qualifications which the School deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).

*\*A check of the Children's Barred List is not permitted if an individual will not be undertaking "regulated activity". Whether a position amounts to "regulated activity" must therefore be considered by the School in order to decide which DBS checks are appropriate. It is however likely that in nearly all cases a Children's Barred List check will be carried out.*

*\*\*The School carries out these via the Teacher Services' system (formally known as Employer Access Online). This service allows the School to identify existing prohibitions and sanctions made under section 142 of the 2002 Act; teacher prohibitions made under section 141 of the 2002 Act; any direction made under 128 of the 2008 Act; sanctions or restrictions imposed by the General Teaching Council for England before its abolition in March 2012; and teacher sanctions or restrictions imposed by European Economic Area regulating authorities on or after 18 January 2016.*

### **3. 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 the School's practice to ask applicants to complete a Health Questionnaire which is then, if necessary, reviewed by the School's medical advisor against the Job Description for the role, along with other physical or mental requirements of the role i.e. proposed timetable, 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. The School may also seek a further medical opinion from a specialist or request that the applicant undertakes a full medical assessment.

The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting the applicant, obtaining medical evidence, considering reasonable adjustment and suitable alternative employment, where available.

### **4 Pre-Employment Checks**

In accordance with the recommendations set out in KCSIE 2016, DUCA and the requirements of the Education (Independent School Standards) (England) Regulations 2014 the School is required to carry out a number of pre-employment checks in respect of all prospective employees. These include the following:-

#### ***Verification of identity and address***

All applicants who are invited to an interview will be required to bring the following evidence of identity, right to work in the UK, address and qualifications as set out below and in the list of valid identity documents in 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;
- original documents confirming any educational and professional qualifications referred to in their application form, and
- an existing DBS disclosure certificate in the applicant's name if the applicant possesses 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.

The School asks for the date of birth of all applicants (and proof of this). Proof of date of birth is necessary so that the School may verify the identity and check for any unexplained discrepancies in the employment and education history of all applicants. The School does not discriminate on the grounds of age.

## **References**

References will be taken up on short-listed candidates prior to interview.

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the School. 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 referee 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. Referees will also be asked to confirm that (to the best of their knowledge) the applicant has not been radicalised so that they do not support terrorism or any form of "extremism" (see the definition of "extremism" at paragraph 7 below). All referees will be sent a copy of the job description and person specification for the role which the applicant has applied for. 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;  
*(Questions about health or sickness records will only be sent out after the offer of employment has been made.)*
- 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 false, unsubstantiated 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 false, unsubstantiated or malicious;
- whether the applicant, to the best of their knowledge, could be considered to be involved in "extremism" (see definition of "extremism" in Section 7 'Visiting Speakers and the Prevent Duty')

Once a conditional offer of employment has been made the school may take up further references in connection with the candidate's sickness and absence record.

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, (e.g. delays in receipt, specific questions not answered satisfactorily, any expression of concern about the suitability of the candidate, any doubt about the validity of the reference), will be followed up appropriately by the School's HR department. From 1 September 2016 the School will make telephone contact with referees to verify their authenticity. When verifying references the School will make contact with referees via the referee's work telephone number and not private mobile numbers.

It is a criminal offence to falsify references. Any applicants or referees who are found to have submitted false references to the School will be referred to the Local Area Designated Officer (LADO).

### ***Disclosure and Barring Service check***

Due to the nature of the work, the School applies for an enhanced disclosure from the Disclosure and Barring Service (DBS) in respect of all prospective staff members and volunteers deemed to be working in regulated activity.

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.

Since 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 DBS and the Home Office have developed a set of filtering rules relating to spent convictions which work as follows:

#### **For those aged 18 or over at the time of an offence**

An adult conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:

- eleven years have elapsed since the date of conviction;
- it is the person's only offence; and
- it did not result in a custodial sentence.

It will not be removed under any circumstances if it appears on a list of "specified offences" which must always be disclosed. If a person has more than one offence on their criminal record, then details of all their convictions will always be included.

A caution received when a person was aged 18 or over for an offence committed in the United Kingdom will not be disclosed if six years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

#### **For those aged under 18 at the time of an offence**

A conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:

- five and a half years have elapsed since the date of conviction;
- it is the person's only offence; and
- it did not result in a custodial sentence.

Again, the conviction will not be removed under any circumstances if it appears on the list of "specified offences", or if a person has more than one offence on their criminal record.

A caution received when a person was aged under 18 for an offence committed in the United Kingdom will not be disclosed if two years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

## **The list of "specified offences" which must always be disclosed**

This contains a large number of offences, which includes certain sexual, violent and other offences that are considered so serious they will always be disclosed, regardless of when they took place or of the person's previous or subsequent criminal record. 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 School 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:

- frequently, meaning once a week or more on an ongoing basis; or
- overnight, meaning between 2.00 am and 6.00 am; or
- if it satisfies the "period condition", meaning four times or more in a 30 day period; **and** provides the opportunity for contact with children.

Roles which are carried out on an unpaid / voluntary basis will normally amount to regulated activity unless the volunteer is regularly supervised by someone who is themselves in regulated activity.

It is for the School 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 or voluntary posts which are supervised.

The DBS now issues a 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 the School within two weeks of it being received by the applicant. Original certificates should not be sent by post. A convenient time and date for doing so should be arranged with the Human Resources Department as soon as the certificate has been received. Applicants who are unable to attend at the School 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. Certified copies must be sent to the Human Resources Department. Where a certified copy is sent, the original disclosure certificate must still be provided on the first working day. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School.

If there is a delay in receiving a DBS disclosure or overseas police background checks (see below) (or, in the case of staff joining from overseas, the DBS application cannot be submitted until arrival in the UK and verification of ID and address has taken place) the Headmaster has the discretion to allow an individual to begin work pending receipt of the disclosure. 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 safeguards have been put in place.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants may also be asked to apply for the equivalent of a disclosure, if one is available in the relevant jurisdictions - see below for further details of overseas checks.

DBS certificates do not expire and there is no requirement for the School to re-check current employees. However, following guidance received from Richmond LSCB in 2014 the School introduced a policy of renewing DBS checks on a rolling programme.

### ***Prohibition from teaching***

The School is required to check whether staff who carry out "teaching work" are prohibited from doing so. The School uses the Teachers' 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 NCTL.

In addition we ask all applicants for roles which involve "teaching work" to declare in the application form whether they:

- have ever been the subject of a sanction, restriction or prohibition issued by the NCTL, or any predecessor or successor body;
- have ever been the subject of any proceedings before a professional conduct panel of the NCTL, or equivalent body in the UK.

The School recognises that a prohibition from teaching order may not last indefinitely. The School also notes that professional conduct panels do not always impose sanctions on the subject of the hearing. However, in order to fully assess the suitability of an applicant the School considers it important that all such information is made available during the recruitment process. Where an applicant is not currently prohibited from teaching, but has been the subject of a professional conduct hearing whether 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 the School.

The existence of any relevant information is not a bar to employment with the School.

The School carries out this check, and requires associated information, for roles which involve "teaching work". In doing so the School 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 pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

If in any doubt, or if the applicant has taught previously, or may teach in the future, the check



will be undertaken including for sports coaches / assistants and technicians.

In addition, for all appointments to roles which involve "teaching work" made on or after 18 January 2016, the School checks whether the applicant is subject to a sanction imposed by a regulator of the teaching profession in any other European Economic Area. For the same reasons as set out above the School also ask applicants to declare whether they:

- have ever been the subject of a sanction imposed by a regulator of the teaching profession in any other country; and
- have ever been the subject of any proceedings before a professional conduct panel, or equivalent body, in any other country.

### ***Prohibition from Management Checks***

The School 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).

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

- Proprietor
- Headmaster
- Teaching posts on the senior leadership team
- Teaching posts which carry a departmental head role
- Support staff posts on the senior leadership team

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 NCTL Teacher Services system. The School will use either, or both, methods to obtain this information.

In addition the School asks all applicants for management roles to declare in the application form 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.

It is the School's position that in order to fully assess the suitability of an applicant for a management role it must be provided with the above information. 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 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 School will consider whether the facts of the case render the applicant unsuitable to work at the School.

### **Disqualification by Association**

The Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009 state that it is an offence for the School to employ anyone in connection with 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 the EYP or LYP. For children who are above Reception age but under 8, the normal school day and after-school, co-curricular educational clubs are not within the scope of the Disqualification by Association regulations. For this age group, therefore, only provision which would be considered 'childcare' is relevant. This essentially means crèche-like facilities before and after school. However, in order to provide flexibility should any other element of supervision of any pupils under the age of 8 fall under the category 'childcare' all members of Pre Prep teaching staff and Pre Prep support staff and members of the Senior Leadership Team concerned in the management of such provision will be required to complete a declaration. Other staff may be required to complete such a declaration if they at any time qualify given their roles and duties.

Relevant staff are required to read and complete a declaration confirming that they are not disqualified under these Regulations from working at Harrodian.

### ***Overseas checks***

In addition to DBS checks, from April 2017, all applicants with periods of overseas residence and those with little or no previous UK residence will also be asked to provide further information, including a criminal records check from the relevant jurisdiction. The HR department will assess each applicant individually, although the School will usually request an overseas criminal records check if a candidate has resided overseas for a period of 12 months or more in the past 10 years whilst over the age of 18. In some cases it may be deemed necessary to request a criminal record check for each country. In addition, a criminal record check from the country of nationality will be requested.

Harrodian refers to Home Office guidance on what checks are available from different countries. Extra references are requested for applicants from countries which do not provide criminal record checks.

## **5. Contractors and Supply Staff**

Contractors engaged by the School must complete the same checks for their employees that the School is required to complete for its staff. The School requires confirmation (in writing) that these checks have been completed before employees of the Contractor can commence work at the School.

"Supply staff" are staff supplied by an "employment business" (agency) to work under the control of the School. Agencies who supply staff to the School must also complete the pre-employment checks which the School would otherwise complete for its staff. Again, the School requires confirmation in writing that these checks have been completed before an individual can commence work at the School.

The school will independently verify the identity (using photographic ID) of staff supplied by contractors or an agency and will require a copy of the DBS disclosure certificate checked by the contractor or agency before the individual can start work in the school.

## **6. Volunteers and Examination Invigilators**

The School will request an enhanced DBS disclosure and Children's Barred List information for all volunteers who undertake regulated activity at the School.

Under no circumstances will a volunteer, in respect of whom no safeguarding checks have been undertaken, be left unsupervised with children or allowed to engage in regulated activity.

It is the School's policy that a new DBS certificate is required for volunteers and invigilators who 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 as this permits the School to obtain up to date criminal records information without delay to each new activity in which a volunteer participates.

## **7. Visiting Speakers and the Prevent Duty**

The Prevent statutory guidance requires the School to ensure that any visiting speakers who might fall within the scope of the Prevent Duty, whether invited by staff or pupils, are suitable and appropriately supervised.

All visiting speakers will be subjected the School's usual visitor procedures. This will include signing in and out at reception and being escorted by a fully vetted member of staff between appointments.

The school will also obtain formal and informal background information about visiting speakers. In carrying out risk assessments the School will always have regard to the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

*"Extremism" is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations."*

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, disability or age.

## **8. Policy on recruitment of ex-offenders**

### ***Background***

The School shall not unfairly discriminate against any subject of a Disclosure on the basis of

conviction or other information disclosed and appointments shall be made on the basis of merit and ability. The School welcomes applications from a wide range of candidates and actively promotes equality of opportunity for all with the right mix of talent, skills and potential. 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 and accordance with the objective assessment criteria set out 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 when applying for a position at the School 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 4 above). A failure to disclose a previous conviction 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 attempt to apply for a position at the School. The School 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;
- it has serious concerns about an applicant's suitability to work with children.

We ensure that all those in the School who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

Further information on the DBS can be found on [www.homeoffice.gov.uk](http://www.homeoffice.gov.uk)

### ***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, the School will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the age of the applicant when the offence was committed and the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- the applicant's subsequent career and good behaviour;

- 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.

### ***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, the School will carry out a risk assessment by reference to the criteria set out above.

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.

## **9. 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.

In particular, the School will:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of the School's Human Resources Department and Headmaster;
- not retain disclosure information or any associated correspondence for longer than is necessary, which is generally for a period of up to six months. If, in very exceptional circumstances it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so. The School will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the

position in question, the unique number issued by the DBS and the recruitment decision taken;

- ensure that any disclosure information is destroyed by suitably secure means such as shredding;
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

## **10. Retention of records**

The School is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the School will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help the School to discharge its obligations as an employer e.g. so that the School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by the School for the duration of the successful applicant's employment with the School. It will be retained for a period of six months after employment terminates after which it will be securely destroyed.

If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.

## **11. Referral to the DBS and NCTL**

This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that any offer of employment is subject to. Whilst these checks are carried out pre-employment, the School also has a legal duty to refer to the DBS any person who:

- has applied for a position at the School despite being barred from working with children;
- has harmed, or poses a risk of harm, to a child, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

If the person is a teacher the school should also make a referral to the NCTL.

## **12. Queries**

If an applicant has any queries on how to complete the application form or any other matter he/she should contact Human Resources.

## Appendix 1

### List of valid identity documents

#### Group 1: primary identity documents

- current valid passport
- biometric residence permit (UK)
- current driving licence (photocard with paper counterpart; full or provisional; UK / Isle of Man / Channel Islands and EU); birth certificate (UK & Channel Islands - issued at the time of birth (within 42 days of date of birth); full or short form acceptable 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 UK driving licence (paper version; UK/ Isle of Man / Channel Islands and EU; full or provisional)
- current driving licence (photocard; all countries; full or provisional)
- current non-UK driving licence (valid for up to 12 months from the date the applicant entered the UK)
- birth certificate (UK and Channel Islands; issued at any time after the date of birth by the General Registrar Office / relevant authority i.e. Registrars)
- marriage / civil partnership certificate (UK and Channel Islands)
- HM Forces ID card (UK)
- fire arms licence (UK, Channel Islands and Isle of Man)

#### Group 2b: Financial and social history documents

- mortgage statement (UK or EEA)\*\*
- bank / building society statement (UK and Channel Islands or EEA)\*
- bank / building society account opening confirmation letter (UK)
- credit card statement (UK or EEA)\*
- financial statement e.g. pension, endowment, ISA (UK) \*\*
- P45 / P60 statement (UK and Channel Islands) \*\*
- council tax statement (UK and Channel Islands) \*\*
- work permit / visa (UK) (valid up to expiry date) \*\*
- letter of sponsorship from future employment provider (non UK / non EEA 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 \*
- benefit statement e.g. child benefit, pension (UK) \*
- a document from central or local government/ government agency / local authority giving an entitlement e.g. from the Department for Work and Pensions, the Employment Service , HM Revenue & Customs (HMRC), Job Centre, Job Centre Plus, Social Security (UK and Channel Islands) \*
- EU national ID card (must be valid at time of application)
- cards carrying the PASS accreditation logo (UK and Channel Islands; must be valid at time of application)
- letter from Head or College Principal 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

Person Responsible: Head of HR

Last updated: November 2016

Next update: November 2017