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(6 pages)

1. INTRODUCTION AND AIMS

The safe recruitment of staff is the first step to safeguarding the welfare of children in education. Wotton House International School (WHIS) is committed to safeguarding and promoting the welfare of all pupils in its care. We expect all staff and volunteers to share this commitment.

1. This policy is consistent with legislation including the Children Act 2004, Safeguarding Children and Safer Recruitment in Education Guidance DfES/04217/2006, The Independent Schools Standards Regulations 2014 (ISSR) (Standards 4, 4A, 4B, 4C) and the Safeguarding Vulnerable Groups Act 2006.
2. **Aims And Objectives:** to help deter, reject or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.
3. The objectives are:
 1. to ensure that the best possible staff are recruited on the basis of their abilities & suitability;
 2. to ensure that all job applicants are considered equally, fairly and consistently;
 3. 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 – 2020 (KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS);
 4. to ensure that we meet our commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

2. GENERAL POINTS

1. Employees involved in staff recruitment are responsible for familiarising themselves with and complying with the provisions of this policy.
2. We have a principle of open competition in our approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job based on their abilities, qualification, experience and merit as measured against the job description and person specification.
3. The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment and safeguarding legislation. We aim to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies.
4. **Definition of Regulated Activity and Frequency:** Any position undertaken at, or on behalf of the School will amount to "regulated activity" if it is carried out:
 1. frequently, meaning once a week or more; or
 2. overnight, meaning between 2.00 am and 6.00 am; or
 3. satisfies the "period condition", meaning four times or more in a 30 day period; and

4. provides the opportunity for contact with children.
 5. Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.
 6. We are not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity".
 7. We are required to carry out an enhanced DBS check for all staff, including supply staff, who will be engaging in regulated activity. However, we 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.
- 5. Roles And Responsibilities.**
1. It is the responsibility of the Proprietors to:
 1. Ensure WHIS has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements.
 2. Monitor WHIS's compliance with them.
 2. It is the responsibility of the Principal and other Managers involved in recruitment to:
 1. Ensure that WHIS operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the School.
 2. Monitor contractors' and agencies' compliance with this document.
 3. Promote welfare of children and young people at every stage of the procedure.
- 6. Other**
1. **The Rehabilitation of Offenders Act 1974:** This does not apply to positions which involve working with, or having access to pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' **must be** declared when applying for **any** position at WHIS.
 2. If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant they must declare it as soon as possible and avoid any further involvement.
 3. **Monitoring and Evaluation:** The Administrator has responsibility delegated to them from the Principal for ensuring that this policy is monitored and evaluated throughout the School. The safer recruitment checks on all new members of staff are signed off by the DSL and the Principal. These forms are kept at the front of the individual personnel folders.

3. RECRUITMENT AND SELECTION PROCEDURE

1. **Advertising:** To ensure equality of opportunity, we will externally and internally advertise all vacant posts to encourage as wide a field of applicant as possible. Any advertisement will make clear our commitment to safeguarding and promoting the welfare of children. All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA).
2. **Application Forms:** We use our own application form to ask questions about applicants' academic and full employment history ((including any gaps or discrepancies) and suitability for the role. Incomplete application forms will not be shortlisted without further investigation. The application form will include a declaration regarding convictions and working with children, and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974. CVs can be submitted as a first pass, however all applicants will also be asked to fill out an application form. 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. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.
3. **Job Descriptions and Person Specifications:** The job description will clearly and accurately set out the duties and responsibilities involved. The person specification informs the selection decision. It details the skills, experience, abilities and expertise that are required for the job.
4. **References:** References for shortlisted applicants will be sent for immediately after short listing. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted at that stage.
 1. Offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the School. Where possible one of the references must be from the applicant's current or most recent employer. If the current employment does not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. The referee should not be a relative. References will always be sought and obtained directly from the referee and their

- purpose is to provide objective and factual information to support appointment decisions.
2. In the event of a suitable applicant - with full DBS in place - whose referees have not both returned the completed forms due to vacation/work etc - we will make contact by telephone with the referee named and make a note of such a call which we may consider as a reasonable stop gap until the paperwork is returned. If we have at least one reference in place, we may allow the applicant to take up the position in a temporary capacity and with the understanding that the confirmation is pending the second positive reference being returned. A risk assessment will be carried out and signed off by the DSL and the Principal.
 3. Referees will be asked whether they believe the applicant is suitable for the job for which they have applied and if they have any reason to believe that the applicant is unsuitable to work with children.
 4. Any discrepancies or anomalies will be followed up. Direct contact by phone may be undertaken with each referee to verify the reference.
 5. The School does not accept open references, testimonials or references from relatives.
5. **Interviews** There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It can also enable the school to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).
1. Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstances of the individual case during the interview process, if it has not been disclosed on the application form.
 2. At least one member of the interviewing process should have undertaken safer recruitment training.
 3. It is recommended that all applicants who are invited to an interview bring evidence of their identity, address and qualifications. Only original documentation will be accepted and photocopies will be taken. Unsuccessful applicants' documents will be destroyed six months after the recruitment programme.

4. OFFER OF APPOINTMENT AND NEW EMPLOYEE PROCESS

1. In accordance with the recommendations in KCSIE and the requirements of the ISSR and the Boarding schools: National Minimum Standards we carry out a number of pre-employment checks in respect of all prospective employees. If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:
 1. the agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment;
 2. verification of the applicant's identity (where that has not previously been verified);
 3. the receipt of two references which the School considers to be satisfactory;
 4. for positions which involve "teaching work":
 1. the School being satisfied that the applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by the National College for Teaching and Leadership, or any predecessor or successor body, or by a regulator of the teaching profession in any other European Economic Area country which prevents the applicant working at the School or which, in the School's opinion, renders the applicant unsuitable to work at the School; and
 2. the School being satisfied that the applicant is not, and has never been, the subject of any proceedings before a professional conduct panel or equivalent body in the UK or any other country for any reason which prevents the applicant working at the School or which, in the School's opinion, renders the applicant unsuitable to work at the School;
 5. where the position amounts to "regulated activity"
 1. the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory;
 2. confirmation that the applicant is not named on the Children's Barred List;
 3. confirmation that the applicant is not 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;
 4. where relevant, confirmation that the applicant is not 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;
 6. verification of the applicant's medical fitness for the role;
 7. verification of the applicant's right to work in the UK;
 8. any further checks which are necessary as a result of having lived or worked outside of the UK;
 9. 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).
2. A personnel file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The checklist will be retained on personal files.
 3. **Induction Programme:** All new employees will be given an induction programme which will clearly identify the School policies and procedures, including the Safeguarding Policy, the Code of Conduct and Part One of KCSIE and make clear the expectations which will govern how staff carry out their roles and responsibilities.

5. CHECKS

1. **DBS (Disclosure and Barring Service) Certificate** (formerly known as CRB Disclosure): 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).
 1. It is our policy that the DBS disclosure **must be** obtained before the commencement of employment of **any** new employee. In the event of an occasional member of staff's DBS not having yet come back, a full risk assessment is carried out and the employee is accompanied at all times whilst in the building.
 2. It is our policy to ask all staff members to sign an Ongoing Suitability Staff Declaration at the start of every year.
 3. Members of staff must inform the Principal or the Proprietors of any cautions or convictions that arise between these checks taking place.
 4. DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. Where the staff member comes from overseas, we will request a police check from their country of origin - or from the country in which they were last residing.
 5. Portability of DBS Certificates Checks: Staff may wish to join the DBS Update Service if they are likely to require another check in the future. Applicants may sign up to the Service if their check was issued after 17 June 2013, for a small fee per annum, which is payable by the applicant.
 6. Copies of DBS Checks: The DBS no longer issue Disclosure Certificates to employers, therefore employees/applicants should bring their Certificate to the School Administrator (for employees within 7 days of issue or applicants before they commence work or any project involving regulated activity).
 7. **Dealing with convictions:** If a DBS Certificate is returned with details of convictions.
 1. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:
 1. the nature, seriousness and relevance of the offence;
 2. how long ago the offence occurred;
 3. one-off or history of offences;
 4. changes in circumstances,
 5. decriminalisation and remorse.
 2. A formal meeting will take place face-to-face to establish the facts with the Principal. A decision will be made following this meeting. 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 Principal will evaluate all of the risk factors above before a position is offered or confirmed.
 3. 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.
2. **Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status:** All applicants invited to attend an interview at the School will be required to bring their identification documentation such as passport, birth certificate, driving licence etc. with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006
3. **Medical Fitness:** For teachers only: Under Section 141 of the 2002 Education Act and subsequent regulations there is a duty on school employers to ensure teachers are physically and mentally fit to teach and have the health and physical capacity to carry out activities such as planning, preparing and delivering lessons.
 1. Teachers and those training to become teachers need a high standard of physical and mental fitness to enter or remain in the teaching profession: teaching is a demanding career and teachers have a duty of care towards the pupils in their charge with regard to health, education, safety and welfare.
 2. All applicants are requested to sign a self-declaration of fitness to teach and where appropriate a doctor's medical report may be required. 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
 3. The School 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 and considering reasonable adjustments.

4. **Overseas checks:** The School, in accordance with the UK Visas and Immigration (UKVI) will, if applicable, sponsor new foreign nationals. In addition, for applicants who have lived or travelled abroad for more than 3 months the school will seek to obtain a criminal records check from the relevant country.

6. OTHER DETAILS

1. **Single Central Record** of Members of Staff: In addition to the various staff records kept in School and on individual personnel files, a single centralised record of recruitment and vetting checks is kept in accordance with the ISSR requirements. This is kept up-to-date and retained by the school. The Single Central Record will contain details of the following:
 1. All employees who are employed to work;
 2. All employees who are employed as supply staff whether employed directly or through an agency;
 3. All others who have been chosen by the School to work in regular contact with children. This will cover volunteers, Governors, peripatetic staff and people brought into the School to provide additional teaching or instruction for pupils but who are not staff members eg: sports coaches etc
2. **Record Retention / Data Protection**
 1. 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.
 2. This documentation will be retained for the duration of the successful applicant's employment with the School and for 50 years after that. All information retained on employees is kept centrally in a secured record store.
 3. The same policy applies to any suitability information obtained about volunteers involved with School activities.
 4. We will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (ie: shredded). The 6 month retention period is in accordance with the Data Protection Act 1998.
3. **Ongoing Employment:** We recognise that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. We will therefore provide ongoing training and support for all staff, as identified through the Annual Review/appraisal procedure.
4. **Leaving Employment:** Despite the best efforts to recruit safely there may be occasions when allegations of serious misconduct or abuse against children and young people are raised. This policy is primarily concerned with the promotion of safer recruitment but the School also has a legal duty to make a referral to the DBS in circumstances where an individual:
 1. has applied for a position at the School despite being barred from working with children; or
 2. 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.
 3. If the individual referred to the DBS is a teacher, the School may also decide to make a referral to the National College for Teaching and Leadership.
5. **Contractors and Agency staff**
 1. Contractors in regulated activity must complete the same checks for their employees that the School is required to complete for its staff. The School requires confirmation that these checks have been completed before employees of the Contractor can commence work at the School.
 2. Any contractors brought in for maintenance purposes (ie gas or fire etc) are never left unattended. Where possible we carry out maintenance checks in the school holidays.
 3. 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 that these checks have been completed before an individual can commence work at the School.
 4. The School will independently verify the identity of staff supplied by contractors or an agency and will require the provision of the original DBS certificate before contractors or agency staff can commence work at the School.
6. **Visiting Speakers**
 1. The Prevent Duty Guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.
 2. We are not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity or perform any other regular duties for or on behalf of us.

3. All visiting speakers will be subject to our usual visitors signing in protocol. This will include signing in and out, wearing a visitor's badge at all times and being escorted by a fully vetted member of staff between appointments.
 4. We 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 we will have regard to the Prevent Duty Guidance and the definition of "extremism" in KCSIE:
 1. "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."
 5. In fulfilling its Prevent Duty obligations we do 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.
- 7. Volunteers, Interns and Workaways**
1. The School will request an enhanced DBS disclosure or national equivalent and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of the School (the definition of regulated activity set out above will be applied to all volunteers).
 2. Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils.
 3. It is our policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the 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 prior to each new activity in which a volunteer participates.
 4. 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):
 1. formal or informal information provided by staff, parents and other volunteers;
 2. character references from the volunteer's place of work or any other relevant source; and
 3. an informal safer recruitment interview.

Revision Control Table	
Drawn up by	D Sturdy
Date	01/06/18
Review schedule	Annual
Reviewed	01/06/19 by DS
Reviewed	01/06/20 by DS (minor amends and tidying)
Reviewed	01/11/21
Next review	01/11/2022