

Recruitment Policy and Compliance Checks Procedures

This non-contractual policy details the compliance obligations relating to Oundle School (OS) and Laxton Junior School (LJS) (together the School) in relation to the recruitment and engagement of staff. It may be amended by the School from time to time as appropriate, for example to incorporate changes in Regulations, Guidance or in line with good practice. The Human Resources department will ensure this policy is regularly reviewed by the Leadership team and that key changes are highlighted and communicated as appropriate.

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Scope

This policy applies to applicants for employment and others working in or on behalf of the School and provides guidance to line managers and HR staff to ensure the appropriate checks are undertaken. It aims to provide initial and sufficient information and further signposting for applicants to enable transparency on requirements and informed consent to ensure compliance.

Broadly there are two categories of checks relating to individuals who work at the School:

- **Direct safer recruitment checks**, where we will carry out the necessary checks on the individual, and will include all Staff on the School payroll, Governors, Volunteers in Regulated Activity and the Self-employed, and
- **Indirect safer recruitment checks**, where confirmation that the necessary checks have been carried out must be provided, in writing as specified, to the School. This group includes Staff of Contractors, Supply Staff and Visiting Professionals, i.e. student teachers, public-sector staff, CCF instructors, sports referees and other professionals supplied by a central body. Please note it is insufficient to assume that any contract referencing safeguarding checks is adequate evidence.

Our Aims

We are committed to safeguarding and promoting the welfare and wellbeing of children and young people and expect all those working for and on behalf of the School, to share this commitment. This includes employed Staff, Governors, the Self-employed, Contractors and Volunteers. To ensure that we safeguard our pupils, we comply with the requirements as set out by the Department for Education (DfE); Keeping Children Safe in Education (KCSIE), the Boarding Schools: National Minimum Standards (NMS), and the Schedule to the Education (Independent School Standards) Regulations 2014 – the Regulations. The School is inspected by the Independent Schools Inspectorate to assure compliance with the Regulations. Further information and documentation, relevant to engagement, can be found under “Key Policies and Regulations to reference”, below.

We recruit staff who have the necessary competence, skills, knowledge, and experience to fulfil the roles and have satisfied all relevant pre-employment checks in pursuance of their full contribution to the life of the School. We value diversity and understand the benefits of employing and working with a diverse range of individuals, ensuring that the recruitment process is based on capability alone and free from bias on the grounds of protected characteristics such as age, disability, sex, gender reassignment, sexual orientation, pregnancy, maternity, race, religion or belief, or marital status.

Key Policies and Regulations to reference

Staff working in the School: this policy is linked to other policies that you will find helpful and are listed under ‘Essential Reading’ in the [Vacancies](#) section of the School Website. They are: Staff Code of Conduct, Whistleblowing Policy, Safeguarding Policy, Keeping Children Safe in Education (2025), Prevent Policy, DBS Code of Practice and Applicant Privacy Notice.

In addition, the Privacy Notice for Applicants details compliance with Data Protection and the General Data Protection Regulation.

Our website hosts access to the policies electronically. If a hard copy or an alternative format is required please contact a member of the Human Resources team at recruitment@oundleschool.org.uk.

We also follow the guidance and codes of practices published by the Disclosure and Barring Service (DBS), The Statutory Framework for the Early Years Foundation Stage (EYFS), The Childcare Act 2006,

Disqualification under the Childcare Act (DUCA) and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, and The Prevent Duty Guidance for England and Wales 2015 (The Prevent Duty Guidance).

The Recruitment and Pre-engagement Process

Roles open to external applicants can be found on the School website, together with the relevant job description and person specifications. All applicants need to complete an Application Form and where appropriate a Supplement to the Application Form prior to formal interview stage.

This policy lays out our commitment to ensuring compliance in our approach to recruitment and selection, also referencing checks appropriate to other personnel working in or visiting the School, with further signposting as appropriate. As part of our commitment to safeguarding, all shortlisted applicants are required to undergo child protection screening appropriate to the post.

Further information on the recruitment and selection process can be found in Appendix One - The Recruitment Process.

Further information on the pre-engagement process for Governors, Staff of Contractors, the Self-employed and Volunteers is summarised in Appendices Two, Four, Five and Six.

Data Protection

We comply with the Data Protection Act 2018 and the General Data Protection Regulation and process personal information in accordance with our Privacy Notice for Applicants, found on the School's website, and Privacy Notice for Staff found within the Staff Handbook.

Equal Opportunities

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy or maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because of a person's marital or civil partner status.

As detailed in "Our Aims" above we are committed to promoting equality, diversity and inclusion in all aspects of school life, including recruitment. Further information is available in the School's Equal Opportunities Policy.

Pre-employment and pre-engagement checks

Staff Pre-employment checks

All offers of direct employment are conditional upon the satisfactory completion of pre-employment checks as set out below and in more detail in Appendix Two. Please be aware that you cannot start work until your checks have been received and verified to our satisfaction standard. Failure to provide any of the requested information may result in the School not being able to meet its employment, safeguarding or legal obligations, and your start date being delayed, or an offer of employment being withdrawn.

No individual should start working at the School, until the required checks are completed to the satisfaction of the School. Whilst HR will endeavour to keep recruiting managers informed of any potential delays to provisional start dates, it is the responsibility of the line/recruiting manager to ensure that confirmation of clearance is received, before allowing applicants to begin employment.

The checking process will usually be completed by our HR team or, in some cases, by an external provider specifically engaged to support the School with our pre-employment checking process.

The pre-employment checks that we will complete if you are offered a role are summarised below:

- Verification of work history as detailed in the Application Form and clarification of any gaps in that history, qualifications (as required for the role), identity and right to work in the UK, this may include visas under sponsorship by the School.
- Receipt and establishment of references acceptable to the School.
- An enhanced criminal record check from the Disclosure and Barring Service in all instances, with an overseas criminal records check where applicable.
- Where relevant to the role: verification that you are not prohibited from teaching in the UK, not prohibited from teaching overseas, not prohibited from holding a management role and/or not prohibited from acting as a trustee or senior manager of a charity.
- Verification that you are not barred from working with children (if the role amounts to regulated activity, see Appendix Nine).

We reserve the right to complete other checks as applicable to the role and circumstances e.g. social media checks. In some circumstances we will also be required to provide certain information to third parties, such as the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA).

Pre-engagement checks

Supply Staff

Supply staff are defined as, *persons supplied to the School by a business, as a de-facto member of staff*. The checks in Appendix Two apply to supply staff as they would for direct employees (as above). The supply company is required to provide the School with written confirmation that the checks have been completed before such staff are allowed to start work. We will also need to see the original DBS certificate and photo ID on arrival. Confirmation of this sight will be confirmed in writing to HR prior to supply staff commencement, for the file.

Staff of Contractors

A contractor is defined as *a company, or a person employed by a third-party company, who is engaged under a contract to provide a service*. Due to the diverse range of services provided by our contractors, there are varying levels of checks required depending on the type of work undertaken, the frequency or length of a project and potential access to our pupils. In order to simplify the process, the following categories apply:

Category 1 – Employees (or sub-contractors) of contractors who are working at the school on a long-term basis or those in “regulated activity” as defined in KCSIE (see Appendix Nine);

Category 2 – Temporary or occasional services; and

Category 3 – Emergency repairs, one-off occasions, deliveries and specialist contractors on site to evaluate or quote for a contract. This category of contractor is usually treated as supervised visitors.

We will decide how we categorise each contractor and work with them to ensure and enable all the required safeguarding and recruitment checks are fulfilled as outlined in Appendix Two.

Further information on Contractor arrangements and requirements can be found in Appendices Two, Four and Five.

Self-employed (paid by the School)

We define Self-employed as, *individuals who work for themselves, but who have a direct agreement with the School to provide a service*. Due to the safeguarding implications, and a self-employed person's inability to complete the required checks on themselves, the checks in Appendix Two apply to self-employed workers as they would for employed staff (as above).

Volunteers

We welcome those who wish to assist the day-to-day operations on a volunteer basis. We recognise Volunteers as a core part of our teams, with a distinctive but complementary role alongside our staff, including activities with fund-raising, accompanying school trips or listening to infant pupils read.

There are two main types of volunteer:

- Occasional Volunteers – these are people who volunteer once, or perhaps a few times a year, e.g. accompanying school day trips (not involving overnight stays), parent and fundraising committees who undertake their activities either off School premises or on-site under supervision. These are usually classed as supervised visitors and are accompanied by a checked member of School staff, so no checks will be required.
- Regular Volunteers – will take on a particular task, on an ongoing basis, are permitted to work unsupervised and as such are in “Regulated Activity”. Therefore checks are required, as detailed in Appendix Two. This includes any volunteer accompanying trips that involve overnight stays or personal care.

Volunteers must wear School issued identification at all times.

Please refer to Appendices Two & Six for further advice.

Visiting Professionals

We require written confirmation that relevant checks have been carried out for any individuals working at the School, who are employed by third parties, i.e. public-sector staff, CCF instructors, sports referees and other professionals supplied by a central body, by the third party by way of a ‘letter of comfort’. This includes student teachers, who should have the information required supplied by their university/ training provider.

In all cases, proof of identity must be seen by the School, upon arrival. Where visiting professionals are not supplied by a central body a risk assessment is to be undertaken in line with the Visitor Control Policy and Procedures.

For further detail, including the risk assessment associated with visiting speakers, please refer to the Oundle School Visitor Control Policy and Procedures.

Checks on non-employed residents

We are a full boarding school and we accommodate a large number of our employees and their families. If you are accommodated by the School, members of your family may also be subject to criminal record checks. Please be aware that checks satisfactory to the School will need to be confirmed before members of your family are allowed to move into School accommodation.

All persons aged 16 and over (not employed by the School) who live on the same premises (or have unrestricted access to the same premises) as our pupils are required to have an enhanced DBS with

Children's Barred List disclosure. There are separate rules for occasional visitors to boarding house, which are set out in our Visitor Policy.

Each non-employed resident aged 16 or over will also be required to sign a written agreement specifying the terms of their accommodation, guidance on contact with boarders, their responsibilities to supervise occasional visitors, and notice that their permission to live in School accommodation may be rescinded if we believe that they are unsuitable to have regular contact with our pupils. They will also be required to notify the HR Department if they are charged with or convicted of any offence.

Work Experience

From time to time the School may be approached to enable students to obtain work experience. Where under 16, supervision will be essential and risk assessments reviewed or considered in relation. Where pupils are over 16 an identity check, DBS and barred list check will also be appropriate. Managers are encouraged to take appropriate responsibility for such risk assessments and engage with HR in their support. Work Experience individuals must wear School issued identification at all times.

Visitors and the Prevent Duty

All visitors attending the School will be subject to the School's Visitors Policy and Prevent Duty. Statutory guidance (Prevent 2015) requires schools to ensure that pupils are not at risk of becoming radicalised or encouraged to involve themselves in terrorist activities. Visiting speakers, whether invited by staff or by the pupils themselves, must be suitable and appropriately supervised. Please refer to the Oundle School Visitor Control Policy and Procedures for further advice.

DBS Disclosure

The School uses an online Registered Body with the Disclosure and Barring Service (DBS) for the purposes of obtaining access to criminal record checks for employment and voluntary appointments. It is of fundamental importance to the School to ensure as far as possible, that those who take up appointments do not pose a risk to the children in its care. It is therefore important that we process and review the past criminal records of any successful applicants for positions, before confirming the conditional offer of appointment.

DBS checks are required not only for staff working at the School, but for anyone who may come into regular or intensive contact with the pupils. This may include volunteers, staff working on behalf of the School, all residents and visitors (aged 16 years and over) living in School accommodation with access to the Boarding Houses. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position. Further details on the DBS requirements can be found in Appendix Two, and in Appendix Seven - DBS Checks and DBS Filtering Rules.

If you have lived or worked overseas, additional police checks relating to your time abroad may be required. The School will review this in relation to the last 10 years.

DBS Code of Practice

The School complies with the DBS Code of Practice and undertakes to treat all applicants fairly. A copy of the DBS Code of Practice can be found on the DBS website, in the 'Vacancies' section of the School's website and in the Staff Handbook.

The School considers it also essential that the confidential and personal Disclosure information from the DBS is used fairly and sensitively. The School undertakes not to discriminate unfairly against any applicant on the basis of a conviction or other information disclosed as a result of a criminal record check. The School makes appointment decisions on the basis of merit and ability. Further details on our processes and how information is handled and stored can be found in Appendix Ten - DBS Checks and DBS Filtering Rules.

Reviewer	AN
Post of Reviewer	Director of HR
Last Review	September 2025
Next Review (annually)	September 2026

APPENDICES

Appendix One: The Recruitment Process

An overview of the steps in the process to appoint a member of staff, for line managers and applicants. For other roles, working for or on behalf of the school, some of these steps may not be required.

1. Job Description

This should include an accurate job purpose, principal accountabilities, required skill set and person specification. It also enables the establishment of shortlisting criteria.

2. Pre-recruitment Authorisation

Before the role is advertised, appropriate authorisation is required from the Head or Bursar incorporating the Director of HR and Director of Finance, as applicable.

3. Advertise Role

The Oundle School advert will include a reference to the standard safeguarding statement of commitment to safeguarding and promoting welfare of children, and the need for the successful applicant to be Enhanced (including Barred List) DBS checked.

4. Role Information & Application Process

All applicants must complete a formal application form in order to ensure consistency in information obtained from candidates and to identify any employment gaps. 'Role Information' includes job advert, job description, information on the School, application process and terms of appointment.

5. On Receipt of an Application

We scrutinise any discrepancies, anomalies, gaps in employment and note to explore if the candidate is invited to interview.

6. Shortlist of Candidates and Invite to Interview

Applications are shortlisted by at least two individuals where applicable against the criteria within the job description.

Shortlisted applicants will be invited to interview via email or direct contact, dependent on the circumstances.

Applicants will be asked if any reasonable adjustments are required to assist them in fully participating in the proposed interview and selection process.

Interview invitations will request applicants to provide proof of qualifications (where required) and documentation to evidence their Right to Work in the UK.

Shortlisted candidates will also be asked to disclose any cautions, criminal convictions, court action, endorsements, Teaching Regulation Agency or equivalent sanctions, restrictions or prohibitions, directions under section 142 of the Education Act 2002 or if referred to the Department of Education. Also if subject to

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. Responses will be given proportionate consideration under the Regulations listed above. See also Appendix Ten - DBS Checks and DBS Filtering Rules.

The School will carry out an online digital presence check as part of the due diligence process on shortlisted candidates. We will discuss any findings with the candidate at an appropriate juncture within the interview process. Confirmation of other checks to be carried out within the recruitment process can be found in Appendix 2.

Should the applicant not be successful at their interview, all documentation submitted will be destroyed in line with the School's data retention guidelines as set out in the Privacy Notice (As drafted and issued with this policy).

8. References

Reference requests should confirm employment, employment history, suitability for the role as well as safeguarding and Prevent Duty requirements. Where organisation policy precludes detailed references, basic information and safeguarding and Prevent Duty requirements will be pursued. References will be verified as required.

The School will request references for shortlisted applicants to academic roles prior to interview. The School will use its discretion when to take up references for applicants to support staff roles, dependent on the individual circumstances, usually taking place post interview for successful applicants. Where references are provided incomplete, or further clarification on the information supplied is required, the School will verify the information with the person that provided the reference.

9. Interview/s

At least two interviewers should normally be present, with at least one being Safer Recruitment trained. Both interviewers ask questions and take notes. The Safer Recruitment trained interviewer to focus on covering all the safer recruitment and Prevent Duty questions. HR hold an up-to-date list of those who have been trained in Safer Recruitment and refresher trained where appropriate.

10. After the Interview

Any anomalies highlighted in the interview will be further investigated through speaking with relevant previous employers. The successful candidate(s) will be contacted by the manager or HR department and offered the role. The unsuccessful candidates will be contacted by the HR department.

11. Conditional Offer of Appointment & Information Pack

A conditional offer letter is raised subject to obtaining two references, medical clearance, evidence of relevant qualifications (if applicable), proof of their Right to Work in the UK, an overseas Police check (if applicable) a Childcare Disqualification Disclosure (where applicable), an overseas police check (where applicable), a prohibition from management check (where applicable) and a Disclosure and Barring Service check that is satisfactory. If the applicant is a teacher, to carry out a TRA check (Teacher Services) and receive any certificates of good conduct / letters of professional standing as required from overseas checks. Only once these checks are received and satisfactory to us can the appointee commence employment.

HR will make direct contact with the successful applicant, usually via email in the first instance, to support compliance with required checks.

An Occupational Health questionnaire is completed and any professional advice arising is reviewed by HR and implemented as appropriate e.g. where reasonable adjustments are required these will be discussed with appropriate confidentiality and with the line manager.

12. Risk Assessments

Only in an exceptional case pre-authorised by the Safeguarding Lead for OS or the Bursar (or in his absence the Director of HR) should an employee commence employment without DBS in place and then only when all other checks are satisfactorily completed, and the DBS Certificate has been issued, though not yet received by the candidate. In this instance a separate children's barred list check will be completed, and a risk assessment may be sought to allow the candidate to commence work, pending receipt of the certificate. Further consideration of the use of a risk assessment may be given for candidates based overseas, where the DBS Certificate is issued, and sent to their overseas address. At no time should this person be allowed to be on their own with children and must be accompanied at all times by another member of staff.

13. Procedures

All procedures need to be compliant with all relevant legislation including the statutory guidance outlined in the Recruitment Policy document.

14. Applicant Commences Employment

All pre-employment checks have been obtained and the applicant commences employment.

15. Induction Process

The Induction process will include a local induction with the new employee's line manager and registration to the Schools' online learning platform for essential online training. The new employee will also be invited to attend the next Support Staff Induction session, as arranged.

Appendix Two – Pre-employment and pre-engagement checks

The number and type of checks that require completion before you start, will depend on the nature of your work at the School. The table below summarises the checks and whether action is required by your, or us. Further details on each of the checks, relevant to your role, are found on the subsequent pages:

	Academic Staff ¹	Support Staff ¹	Governor	Self-Employed Worker	Supply/Agency Staff	Staff of Contractor - Category 1	Staff of Contractor - Category 2	Staff of Contractor - Category 3	Visiting Professionals ³	Volunteers in Regulated Activity
1. Full Work History (since leaving full-time Education)	✓	✓		✓	✓	✓			✓	
2. Qualifications	✓	✓*		✓	✓*	✓*			✓*	
3. Identification	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4. Right to Work	✓	✓	✓	✓	✓	✓			✓	
5. References	✓	✓	✓	✓	✓	✓			✓	
6. Prohibition from Teaching	✓	✓*		✓	✓*	✓*			✓*	
7. Prohibition from Management	✓*	✓*	✓	✓*	✓*	✓*			✓*	
8. Enhanced DBS	✓	✓	✓	✓	✓ ²	✓	✓		✓	✓
9. Child Barred List check	✓	✓	✓	✓	✓	✓			✓	✓
10. Internet & Social Media Searches	✓	✓		✓	✓	✓				
11. Medical Fitness	✓	✓		✓	✓	✓			✓	
12. Certificate of Good Conduct or Overseas Check	✓*	✓*	✓*	✓*	✓*	✓*			✓*	
13. Early Years Disqualification	✓*	✓*	✓*	✓*	✓*	✓*			✓*	✓*
14. Charity Disqualification	✓*	✓*	✓*							
Additional File Requirements										
Fully Completed Application & Supplement Forms	✓	✓								
Interview Notes	✓	✓								
Child Protection Training, relevant to the role	✓ Full TES	✓ Full TES	✓ Govs	✓ Full OS	✓ Full	✓ Full OS	✓ Short OS			✓ Full OS

¹ – Everyone on School Payroll

² – DBS Certificate must be presented to the School, upon arrival, on the first day on site and record of such with id check shared with HR.

³ – Separate arrangements in place to Risk Assess visiting sport officials, not provided by a central body. See Visitor Policy for further guidance.

* – Depending on the role/if required.

	Check completed by us
	What you need to do/information you need to provide
	Check completed by employment business/your employer, and confirmed to us in writing

Verification of your work history

It is an essential part of our checking process that we understand the full work and academic background of all candidates who apply to work at the School. To make sure we understand your full work and academic history we will ask you to complete relevant paperwork during your application process and this will be reviewed with you. If there are any gaps in your employment or academic history these need to be listed on the form and explained to us, for instance gaps could include extended travel abroad between school and starting a job (i.e., a 'gap year'), being unemployed for a period of time, or taking time out of the workplace to look after a dependent etc. If you have spent time living or working abroad, please remember to tell us which countries you visited and how long you were there for.

Please be aware that as part of the application process the School will need to know and see proof of your date of birth. This is necessary so that we can verify your identity and check for any unexplained discrepancies in your employment and education history. We are an equal opportunities employer and do not discriminate on the grounds of age or other protected characteristics.

1. Verification of your qualifications

If we have listed specific professional or academic qualifications within the job description/person specification or during the recruitment process, or if you have listed qualifications as part of your application (and relied on those qualifications to gain the position) the School will need to verify that you have these qualifications. To do this we will need to see the original certificate(s) and we may also contact the awarding body to confirm that the qualifications were awarded.

2. Verification of your identity

We need to verify that you are who you say you are. We also need to see these documents for the DBS checking process.

To verify your identity we need to see at least three identity documents. These documents are those used by the DBS checking authority (see Appendix Three). These must be a mixture of 'primary identity' documents (Group 1 documents), 'trusted government documents' (Group 2a documents) and 'Financial and Social History documents' (Group 2b documents).

If you have changed your name during the course of your life (for example as a result of marriage, adoption or a statutory declaration) we will also need to see documentary evidence of this change. This may, for instance, be in the form of a marriage certificate, adoption certificate or formal confirmation from deed poll.

More information about the types of identity documents we can accept, and which documents are included in groups 1, 2a and 2b, is outlined in Appendix Three – List of Valid Identity Documents.

3. Right to work in the UK

We need to verify that you have the right to work in the UK, to comply with our legal obligations, before you commence employment. This may take the form of:

- a manual right to work check (all nationalities)
- a right to work check using Identity Document Validation Technology (IDVT) via the services of an Identity Service Provider (IDSP) (British and Irish citizens only)
- a Home Office online right to work check (non-British and non-Irish citizens)

Full guidance on the documents we can accept, for manual checks are detailed at:

<https://www.gov.uk/government/publications/right-to-work-checklist/employers-right-to-work-checklist-accessible-version>

The simplest way to prove you have the Right to work in the UK, is by presenting your Passport (British and Irish citizens only), or obtaining a Share Code from <https://www.gov.uk/view-prove-immigration-status> (non-British and non-Irish citizens), and providing this to the HR Department.

The School maintains a Sponsorship Licence and so may, where the role meets the UKVI Qualifying Criteria and according to the needs of the School, consider sponsoring overseas applicants, to ensure the most suitable candidate is appointed.

4. References

All offers of employment are conditional upon the receipt of a minimum of two written references, the content of which must be considered to be satisfactory by the School:

- a) One reference must be from your current/most recent employer (if the School is your current/most recent employer, a reference may be taken from your line manager);
- b) If your current/most recent employment does not involve working with children, then the second reference should be from the employer with whom you most recently worked with children. If it proves impossible to obtain this, a third referee will be required. If you have not worked with children before the second reference will usually be taken from another recent employer.

Please be aware that your referees cannot be a relative or someone known to you solely as a friend or colleague. References need to be from a senior person within an organisation who has the appropriate authority and knowledge to provide a reference for you.

All referees will be asked whether they believe that you are suitable to undertake the role which you have applied for, and whether they have any reason to believe that you are unsuitable to work with children.

Current and previous employers will also be asked to confirm the following:

- a) Your dates of employment.
- b) Your job title and duties.
- c) For those applying for 'teaching roles' (See Note 1 below) - if you have ever been referred to, or are the subject of a sanction, restriction or prohibition issues by the Teaching Regulation Agency, or other equivalent body in the UK.
- d) Your disciplinary record, including whether you have ever been the subject of disciplinary 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, unfounded or malicious.
- e) Whether any allegations have been raised about you that relate to the safety and welfare of children or young people, or behaviour towards children or young people, except where allegations or concerns were found to be false, unsubstantiated or malicious.
- f) Whether you could be considered to be involved in 'extremism' (please see the definition of extremism in Appendix Seven).
- g) Your reason for leaving.

We are aware that it is the policy of some employers to only provide a factual reference (e.g. job title and dates of employment). If your referees only provide such references you will not be disadvantaged, however, we may need to ask for additional references before your appointment can be confirmed.

Please be aware that the School can only accept references obtained directly from the referee – we cannot

rely on references or testimonials provided by you, or on open references or testimonials.

References will be compared with information you have provided as part of your application, and any discrepancies or inaccuracies will be considered by the School and addressed with you and/or the relevant referee. For instance, you and/or your referee may be asked to provide further information, evidence or clarification.

It is routine for the School to request references for shortlisted applicants to academic roles prior to interview. The School will use its discretion when to take up references for applicants to support staff roles, dependent on the individual circumstances, usually taking place post interview for successful applicants. Electronic references will be verified to confirm that they originate from a legitimate source. At the School's discretion, we may contact a referee by phone or email to verify the details supplied within the reference.

Note 1: The definition of teaching is not confined to classroom teaching, it also includes coaching sport and games, and other activities such as working in our Combined Cadet Force. The test we use to determine whether a role is a 'teaching role' is outlined in Appendix Eight.

5. Verification that you are not prohibited from teaching in the UK or overseas

In line with Section 142 of the Education Act 2002, if you intend to carry out 'teaching work' we will need to check that you are not prohibited from teaching. The definition of teaching work is not confined to classroom teaching, it also includes coaching sport and games, and other activities such as working in our Combined Cadet Force. The test we use to determine whether a role undertakes 'teaching work' is outlined in Appendix Eight.

We use the Teaching Regulation Agency Teacher Services system to check whether successful job applicants are the subject to a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the Teaching Regulation Agency, within the UK. We will also ask you, and your referees, to declare whether you have ever been referred to, or are the subject of, a sanction, restriction or prohibition issues by the Teaching Regulation Agency or other equivalent UK body.

If you have ever carried out teaching work outside of the UK we will also ask whether you have ever been referred to, or are subject of a sanction issued by a regulator of the teaching profession in the countries in which you have carried out teaching work. If offered the position, you will be asked to provide evidence of this by obtaining a letter from the professional regulating authority in the country or countries which you worked confirming that they have not imposed sanctions and that they are not aware of any reasons why you may be unsuitable to work with children.

Please be aware, if you are not currently prohibited from teaching but you have been the subject of a referral to, or attended a hearing before, the Teaching Regulation Agency (or other equivalent body overseas) whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, we will need to consider whether the facts of the case render you unsuitable to work at the School.

6. Verification that you are not prohibited from holding a management role

If you have applied for a school management position, we are required to check that you are not subject to a direction under Section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts you from being involved in the management of an independent school. For clarity, we are required to check both external and internal candidates. We obtain this information from the UK Government's published list of individuals issued with Section 128 Directions.

Please be aware, if you are not currently prohibited from management, but you have 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, we will need to consider whether the facts of the case render you unsuitable to work at the School.

7. DBS Checks

Relevant criminal record checks within the UK and overseas

If you are offered a role at the School (this includes roles in a volunteering capacity, where the tasks you undertake are considered “regulated activity” – see Appendix 9 for a full definition) you will be required to undergo a relevant police check. All applicants will require a UK police check, and if you have worked or lived abroad (including extended holidays) in most cases we will also need to conduct an overseas police check.

For the vast majority of our roles the UK police check will be an Enhanced Disclosure from the Disclosure and Barring Service (DBS). The check is conducted at enhanced level when roles are considered to be engaging in ‘regulated activity’.

- a) For more information about what constitutes regulated activity, please see Appendix Nine.
- b) For more information about Enhanced DBS checks, and the current DBS filtering rules, please see Appendix Ten.

Oundle School uses an online Registered Body with the Disclosure and Barring Service (DBS) for the purposes of obtaining access to criminal record checks for employment and voluntary appointments. The DBS will issue a disclosure certificate directly to you, this will not be sent to the School. However, it is a condition of employment that we view the original certificate therefore the HR team will arrange a suitable time with you to bring the certificate into the School. Applicants who are unable to attend 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. Please be aware, where a certified copy is sent, the original disclosure certificate must still be provided on your first working day.

If you have an existing enhanced ‘portable’ DBS which is registered to the DBS Update Service, it may be possible to use this as part of your recruitment checks. The School will need your permission to verify the DBS on the DBS Update website, which will confirm whether the certificate is still current or if there is any additional information on it. The School will also carry out a separate Barred List Check at this point.

The results of both of these checks must be acceptable to the School.

If we applied for your DBS, your employment will remain conditional upon the original certificate being provided and it being considered satisfactory by us. We do not keep copies of the DBS certificate, but we do record the certificate number and date of issue for our records.

8. Verification that you are not barred from working with children

Barred List checks are only available for applicants who will be engaged in regulated activity (for a full definition see Appendix Nine). In practice, the majority of roles at the School are considered to be regulated activity. If you apply for a role which is considered to be regulated activity we are required to undertake a check of the Children’s Barred List before you can start work. The Children’s Barred List is a list of individuals who are barred from working with children and is maintained by the Disclosure and Barring Service.

Please be aware, if you are included on the Children's Barred List you will be breaking the law if you seek to work in regulated activity with children. Please be aware that we are required to make a report to the Police and/or DBS if we:

- a) Receive an application from a barred person;
- b) Are provided with false information in, or in support of an applicant's application; or
- c) Have serious concerns about an applicant's suitability to work with children.

We will check the Children's Barred List either as part of an Enhanced DBS check, or as a separate Barred List check (previously known as a List 99 check). It is at our discretion which option is chosen.

9. Internet and Social Media Searches

In accordance with the guidelines set out by the Department for Education, in Keeping Children Safe in Education, a background check will be carried out on your online digital presence. The timing of these checks will depend on the nature of the role being applied for: for Teaching and roles with pupil responsibility, these checks are conducted on all shortlisted candidates; and for all other roles, during recruitment checks, once an offer of employment has been accepted.

For this we use a third-party professional screening partner experienced in processing personal data for the purpose of such checks. The scope of such checks will include all online open-source information, but specifically:

- Up to 10 years online history
- Social and professional networking and media
- Blogs & vlogs
- News and media reports
- Information displayed publicly online by 3rd parties
- Any other relevant open-source information available

10. Verification of your medical fitness

As a result of specific school-related legislation (including KCSIE, The Education (Independent School Standards) Regulations 2014 and National Minimum Standards of Boarding) we are also legally required to verify the medical fitness of anyone we appoint to ensure they are mentally and physically able to perform the duties of the specified position. Please be aware, this will take place after an offer of employment has been made – and accepted by you – but before the appointment is confirmed.

To determine medical fitness, we ask candidates to complete a health questionnaire which is reviewed by our independent occupational health advisor. The advisor will review your questionnaire against the job description and person specification for the role, together with the details of any other physical or mental requirements of the role (e.g. the proposed teaching timetable, required extra-curricular activities, layout of the School etc.). If the School's health advisor has any doubts about your fitness for the role, we may seek further medical opinions from a specialist or request that you undertake a full medical assessment.

Please be assured that we are aware of our duties under the Equality Act 2010, and we will not withdraw a job offer on the grounds of medical fitness without first consulting with you and considering reasonable adjustments and suitable alternative roles within the School.

11. Overseas Police Checks

We take into account the guidance issued by the NSPCC when deciding whether to request overseas information from applicants and reserve the right to ask you to apply for an overseas police check where you have previously lived or worked overseas. This will usually be where you have worked, for any period of time, or lived overseas, for more than three months, during the last ten years but may be requested in other cases, depending on the role applied for. We will assess each applicant's situation on its individual facts, taking into account any guidance issued by the Secretary of State.

If we do require overseas police check/s you will be notified by a member of the HR team. The process for undertaking overseas police checks varies depending on the country from which they are sought. In most cases you will need to complete additional forms which will need to be returned directly to the authorities in the relevant countries. Depending on the country, the outcome certificate of the overseas police check may be returned directly to you, or it may be returned to the School. In all instances we will need to see the original certificate before you are able to start work.

12. Early Years Disqualification Self-Declaration

All applicants to whom an offer of employment is made to carry out a relevant role in EYP (Early Years Provision) or LYP (Later Years Provision) will be required to complete a Self-Declaration Form confirming whether they meet any of the criteria for disqualification under the Regulations. The School will decide whether a role is relevant and within the scope of EYP or LYP by having regard to the guidance in DUCA (Disqualification under the Childcare Act). 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.

The School 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:

- details of the order, restriction, conviction or caution and the date that this was made;
- the relevant court or body and the sentence, if any, which was imposed;
- and 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 the School's DBS Disclosure Policy). 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.

Waiver of a Disqualification

Where a person discloses information, which appears to disqualify them from working in EYP or LYP, then the School is required to notify Ofsted. The person may apply to Ofsted for a waiver of the disqualification. The School 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.

Retention of Disqualification information

The School 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 in line with the School's data retention guidelines as set out in the Privacy Notice (Note as drafted and issued with this revised policy).

Continuing duty to disclose changes 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.

14. Other checks applicable to Senior Managers of a charity

If you have been appointed to the Governing Body or a senior financial or leadership role, we will need to check that you are not prohibited from acting as a trustee or senior manager of a charity. The Charities Act 2011 sets out the grounds on which a person can be disqualified from acting as a senior manager. These include various spent and unspent criminal offences and other sanctions. We will therefore check the following registers:

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

Please be aware that if you fail to disclose relevant information, or provide false information, about your ability to act as a charity trustee or senior manager of a charity this may amount to a criminal offence. It may also result in the withdrawal of any offer of employment.

All individuals on our Executive Leadership Team also have an ongoing duty to inform the School if there is a change in their circumstances which may result in them becoming disqualified from acting as a senior manager of a charity.

Please be aware, 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. However, we may, at our discretion, withdraw an offer of employment from a senior manager if a waiver application becomes necessary or is rejected by the Charity Commission. For clarity, we are not required to await the outcome of a Charity Commission waiver application before taking these steps.

15. Other checks as applicable to the role and the circumstances

In addition to the checks set out above, we also reserve the right to obtain such formal or informal background information about you as is reasonable in the circumstances to determine whether you are suitable to work with us. This may include credit checks (for example for Finance roles) and additional internet and social media searches.

Appendix Three - List of valid identity documents

Route 1: For DBS applications, the applicant must be able to show:

- one document from Group 1, below
- two further documents from either Group 1, or Group 2a, or 2b, below

The combination of documents presented must confirm the applicant's name and date of birth.

Route 2: can only be used if it's impossible to process the application through Route 1.

The organisation conducting the ID check must then also use an appropriate external ID verification service to check the application.

If the applicant doesn't have any of the documents in Group 1, then they must be able to show:

- one document from Group 2a
- two further documents from either Group 2a or 2b

The combination of documents presented must confirm the applicant's name and date of birth.

Route 3: can only be used if it's impossible to process the application through Routes 1 or 2. For Route 3, the applicant must be able to show:

- a birth certificate issued after the time of birth (UK, Isle of Man and Channel Islands)
- one document from Group 2a
- three further documents from Group 2a or 2b

The combination of documents presented must confirm the applicant's name and date of birth.

Group 1: Primary Identity Documents

- **Passport:** Any current and valid passport. A UK passport can be expired up to a maximum of 6 months.
- **e-Visa:** Accessed via the 'View and Prove' service. The share code requested by the applicant should be an 'immigration status' share code. If you do not have a UKVI account to access your eVisa you can create you can create one online.
- **Biometric residence permit (BRP) (UK):** A BRP showing Indefinite Leave to Remain, Indefinite Leave to Enter or No Time Limit can be used up to 18 months past the expiry date of the BRP. BRP holders should be encouraged to create an account and access their eVisa.
- **Application Registration Card (ARC):** Issued by the Home Office. Must be checked against the Home Office Employer Checking Service.
- **Current driving licence photocard (full or provisional):** Current and valid photocard driving licence issued by UK, Isle of Man, and Channel Islands. From 8 June 2015, the paper counterpart to the photocard driving licence will not be valid and will no longer be issued by DVLA
- **Birth certificate issued within 12 months of birth** (UK, Isle of Man, and Channel Islands - including those issued by UK authorities overseas, for example embassies, High Commissions and HM Forces): Must be original birth certificate. Certified copies are a group 2a document.
- **Adoption certificate** (UK and Channel Islands)

Group 2a: Trusted Government Documents

- **Current driving licence photocard - (full or provisional):** Current and valid. All countries outside the UK (excluding Isle of Man and Channel Islands)
- **Current driving licence (full or provisional) - paper version (if issued before March 2000):** Current and valid. UK, Isle of Man, and Channel Islands. For a paper licence to be valid it must be issued before March 2000 and all information, including name and address, must be up to date
- **Birth certificate - issued after time of birth** (UK, Isle of Man, and Channel Islands)
- **Marriage/civil partnership certificate** (UK and Channel Islands)
- **Immigration document, visa, or work permit** (Issued by a country outside the UK): Valid only for roles whereby the applicant is living and working outside of the UK. Visa/permit must relate to the non-UK country in which the role is based
- **HM Forces ID card or HM Armed Forces Veteran card** (UK)
- **Firearms licence** (UK, Isle of Man, and Channel Islands)

Group 2b: Financial and Social History Documents

- **Mortgage statement** (UK) **
- **Bank or building society statement** (UK and Channel Islands): A print off of a bank statement that is endorsed with a stamp and signed by the bank is acceptable if you cannot have hard copy bank statements posted to you. *
- **Bank or building society statement** (Countries outside the UK): Branch must be in the country where the applicant lives and works *
- **Bank or building society account opening confirmation letter** (UK)*
- **Credit card statement** (UK) *
- **Financial statement, for example pension or endowment** (UK) **
- **P45 or P60 statement** (UK and Channel Islands): Cannot be online document **
- **Council Tax statement** (UK and Channel Islands) **
- **Letter of sponsorship from future UK employment provider:** Valid only for applicants residing outside of the UK at time of application. Must still be valid.
- **Utility bill** (UK): Not mobile telephone bill. Cannot be printed from an online account. *
- **Benefit statement, for example Child Benefit, pension** (UK) *
- **Central or local government, government agency, or local council document giving entitlement, for example from the Department for Work and Pensions, the Employment Service, Local Authority** (UK and Channel Islands): a letter confirming entitlement to benefits. For example: Personal Independence Payment (PIP), free school meals, universal credit, asylum support etc. **
- **HMRC self-assessment letters or tax demand letter** (UK) **
- **European Health Insurance Card (EHIC) or Global Health Insurance Card (GHIC)** (UK): Must still be valid.
- **EEA National ID card:** Must still be valid.
- **Irish Passport Card:** Cannot be used with an Irish passport. Must still be valid.
- **Cards carrying the PASS accreditation logo** (UK, Isle of Man, and Channel Islands): Digital PASS cards are acceptable where they have been issued by an approved digital PASS provider and the QR code has been used to confirm details. Must still be valid.
- **Letter from head teacher, college principal, apprenticeship provider** (UK) for 16 to 19 year olds in full time education or on an apprenticeship - only used in exceptional circumstances if other documents cannot be provided. Issued in the last month.

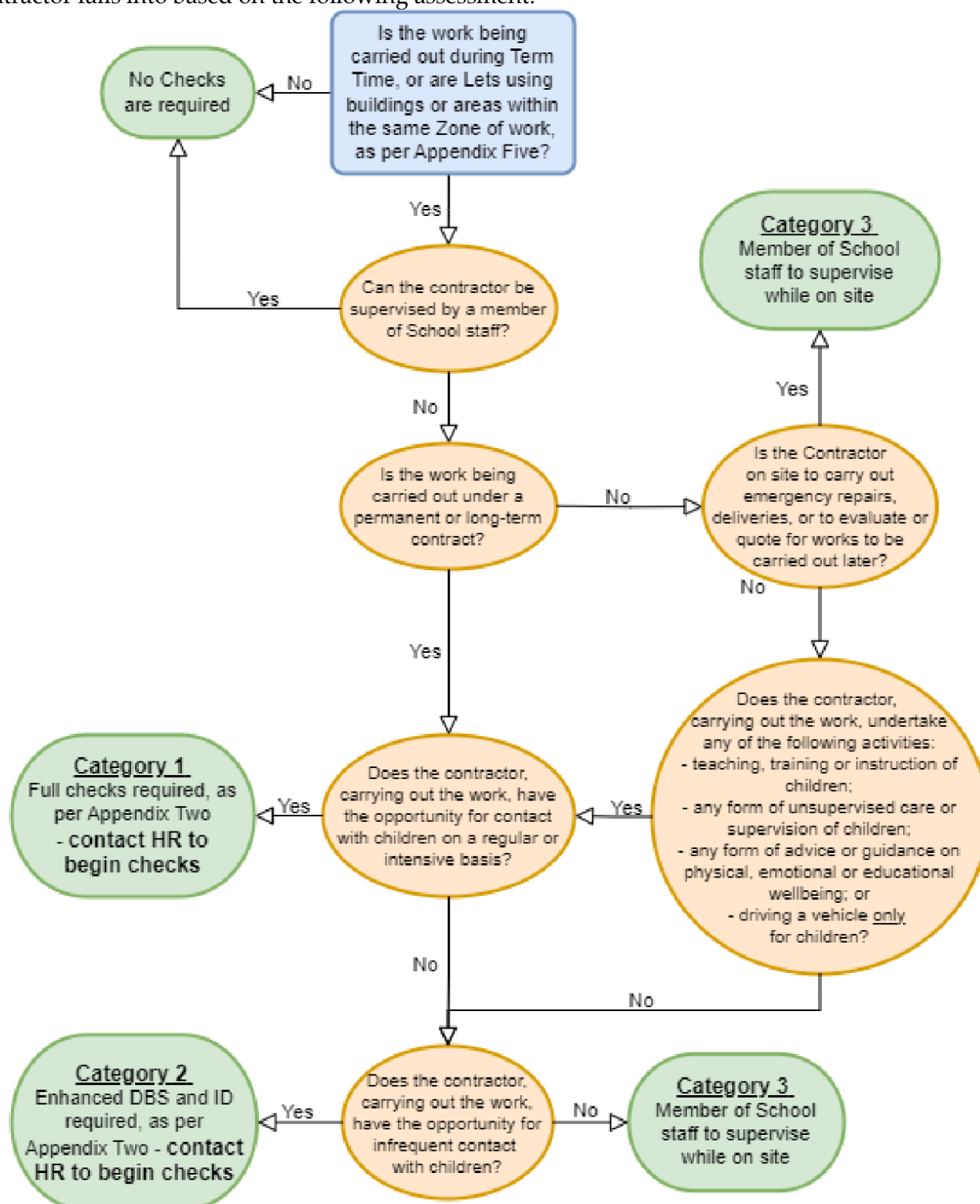
* - less than three months old or since issue

** - less than 12 months old or since issue

Appendix Four – Staff of Contractors

Categories of contractors

The level and type of checks required, are determined by the type of work undertaken, the frequency or length of a project and potential access to our pupils. Where checks are required, these should be supplied to HR, in writing, by the Contractor, prior to commencement of works. We will decide which category a Contractor falls into based on the following assessment:



Management of Contractors

Each contractor will be supported and managed by a 'named contact' who will be a member of the School's staff, from the Department engaging the contractor. This person will provide the contractor with a framework to discuss the details and parameters of the work to be undertaken as well as ensuring that the contractor understands and observes any restrictions, such as safeguarding or health and safety, which may apply. The named contact is responsible for ensuring sufficient support and an appropriate level of contact is in place with the contractor as required.

Supervision

We define supervision as a regulated member of staff, or regulated contractor, knowing where unchecked employees of contractors are at all times and the employees of the contractor should be aware that the regulated member of staff, or regulated contractor, is in the vicinity. All staff of contractors – whether checked or unchecked – should have the boundaries of their operation defined by the responsible member of School staff, to ensure that Safeguarding and health & safety parameters are understood and observed.

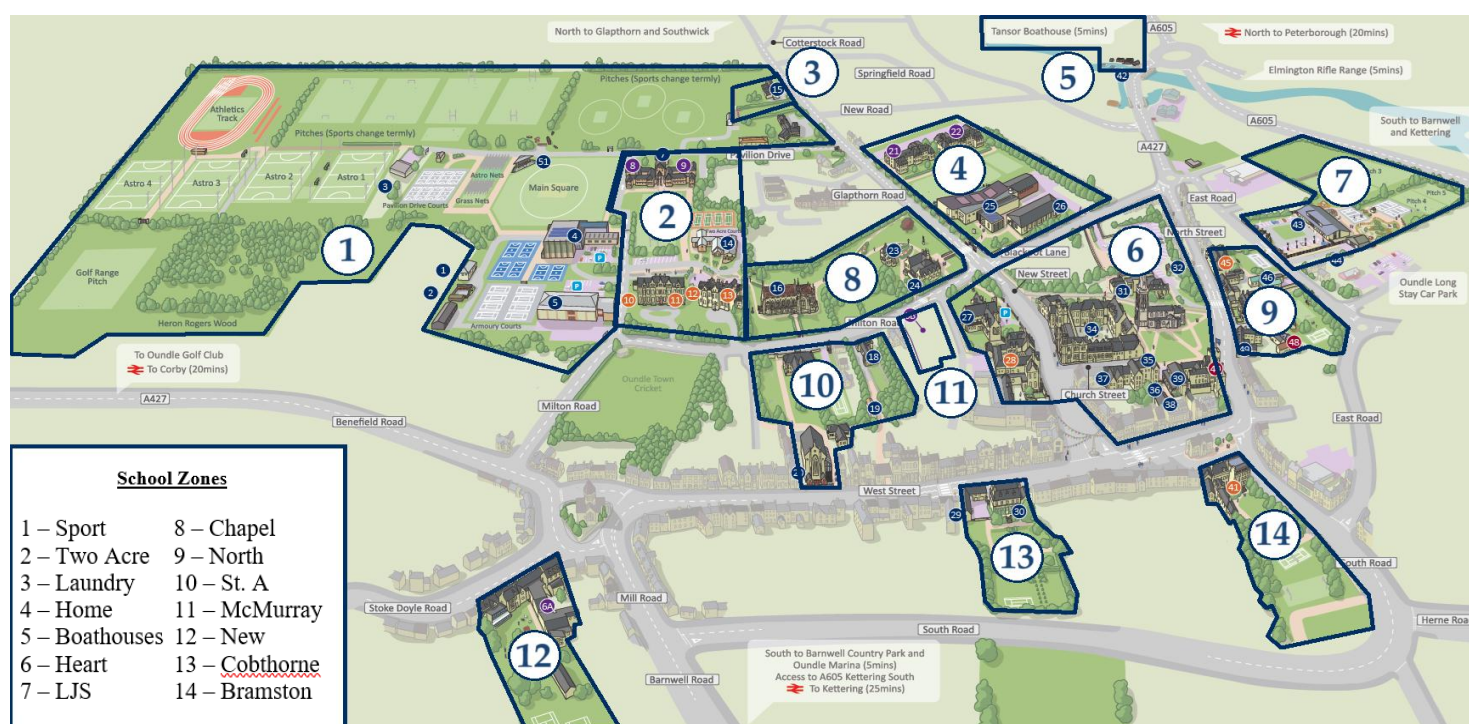
Procedures

Managers and named contacts must notify HR, should they wish to use contractors, who require checks confirming. As much notice as possible should be given to ensure any required checks can be completed, prior to the commencement of works.

HR will seek written confirmation from the contractor that the relevant checks have been completed for any of their employees, who will work at the School. Full details of the checks and requirements are detailed in the "Self-Employed and Staff of Contractors Policy & Procedures".

Staff of contractors should not commence work, unsupervised, until HR have confirmed that the necessary checks have been completed, to our satisfaction. Contractors must be able to show School issued identification at all times.

Appendix Five – School Contractor Zones



Appendix Six – Volunteers

Statement of Intent

Our use of Volunteers is guided by the following principles:

1. The School is not committed to accept all offers of help; we will give a Volunteer the reasons for declining an offer of services.
2. If you are a Regular Volunteer, as defined on page 5, you will be asked to sign a Volunteer Agreement.
3. We recognise that Volunteers donate their time and therefore their contribution should be mutually agreed.
4. Your role, as a Volunteer, will be clearly explained and mutually agreed.
5. You will work within our rules, policies and procedures.
6. You are required to undergo the safer recruitment checks, as set out by us, the Department for Education and/or other regulatory bodies, as applicable.
7. You will complete Child Protection Training, as required by us.
8. You will meet mutually agreed time commitments, or give notice if this is not possible.
9. Volunteers complement, but never substitute the work of paid staff.
10. You are free to leave your voluntary role at any time.

Types of Volunteer

We will risk assess whether or not the Volunteer's role will be "Regulated Activity" and this will inform the level of checks required.

Occasional Volunteers are usually classed as supervised visitors and are accompanied at all times by a member to School staff. However, an occasional volunteer accompanying a school trip which involves an overnight stay, or undertake personal care, are in regulated activity – even if this happens only once – and so are subject to the checks detailed in Appendix Two.

Regular Volunteers are unsupervised and have greater potential access to pupils. Therefore, the School considers these to be in "Regulated Activity", as defined in Appendix Nine, and so subject to the checks detailed in Appendix Two.

Under no circumstances will we permit an unchecked volunteer to have unsupervised contact with pupils.

Full details of the checks and requirements are detailed in the "Volunteers Policy".

Appendix Seven – The definition of ‘extremism’ and Prevent Duty

The School complies with the Prevent Duty guidance and the definition of extremism as set out in Keeping Children Safe in Education (KCSIE).

KCSIE 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.”

The School is an equal opportunities employer and in fulfilling its Prevent Duty obligations does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, gender reassignment, marital or civil partner status, pregnancy or maternity, disability or age.

Useful links:

Keeping Children Safe in Education:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Information about the Prevent Duty:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Appendix Eight – The definition of ‘teaching work’

Teaching work is defined in The Teachers’ Disciplinary (England) Regulations 2012 to encompass:

- Planning and preparing lessons and courses for pupils;
- Delivery of lessons to pupils;
- Assessing the development, progress and attainment of pupils;
- Reporting on the development, progress and attainment of pupils.

(‘Delivery’ includes delivering lessons through distance learning or computer-aided techniques).

None of these actions are considered ‘teaching work’ if the person carrying out the activity does so subject to the direction and supervision of a qualified teacher or a person nominated by the Head.

Appendix Nine – The definition of ‘Regulated Activity’

Regulated Activity is defined in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012).

“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; or
- overnight, meaning between 2.00 am and 6.00 am; or if it
- satisfies the "period condition", meaning 4 times or more in a 30 day period; and
- provides the opportunity for unsupervised contact with children.

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

It is for us to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances. However, please be aware that nearly all posts at the School amount to regulated activity (including all activities relating to personal care, health care, the provision of advice or guidance for children on well-being and driving a vehicle only for children). 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.

We are required to carry out an enhanced DBS check for all employees, supply staff and governors 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.

Appendix Ten – DBS Disclosure Policy, Checks and DBS Filtering Rules

Disclosure checks (DBS checks) and terminology

The DBS disclosure team carries out criminal record checks that result in DBS certificates being issued to an individual. Employers can then ask to see this certificate to ensure that they are recruiting suitable people into their organisation. There are currently three levels of criminal record check:

- basic check
- standard check
- enhanced check (with or without barred lists)

The information contained on each type of check is different, as is the process for applying. The DBS break their checking service down into Basic, Standard and Enhanced checks. The School only uses Enhanced checks as the vast majority of roles consist of regulated activity.

Enhanced check

An enhanced DBS check is suitable for people working with children. The certificate will contain the same details as a standard certificate and, if the role is eligible, an employer can request that one or both of the [DBS barred lists](#) are checked. The certificate may also contain non-conviction information supplied by a Chief Officer, if they feel it is relevant and ought to be contained in the certificate.

An individual cannot apply for an enhanced check by themselves. There must be a recruiting organisation who needs the applicant to get the check. This is then sent to DBS through a [registered body](#). The service is free for [volunteers](#).

Barring

Where requested, an enhanced certificate will also include a check of one or both of the DBS barred lists. If an individual is listed, this will appear on their DBS certificate.

It is the responsibility of the DBS to maintain these lists. This involves making fair, consistent and thorough decisions that are appropriate to the behaviour that has occurred, and considering the risk of future harm.

People are brought to the attention of the DBS barring team in one of three ways:

- automatic barring offence – also known as autobar;
- disclosure; or
- referral.

Automatic – also known as autobar

This is when someone has been newly convicted or cautioned for a serious offence and they are considered for immediate barring, either with or without the opportunity to make representations. This information comes from the Police National Computer.

Disclosure

This is when someone applies for an enhanced DBS check to work with children or adults in certain circumstances, such as those in receipt of healthcare or personal care, and the check reveals relevant information that results in the individual being considered for inclusion on a barred list.

Referral

This is when an employer, volunteer manager or other organisation has concerns that someone has either caused harm or has the potential to cause harm to vulnerable groups and submits a referral to the DBS.

Regulated activity providers (employers or volunteer managers of people working in regulated activity in England, Wales or Northern Ireland) and personnel suppliers have a legal duty to refer to DBS where conditions are met.

DBS filtering rules

The DBS and the Home Office have developed a set of filtering rules that 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 on the Government website or by clicking on the link here:

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

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 (and does not have to be disclosed) if:

- eleven years have elapsed since the date of conviction;
- it did not result in a custodial sentence;
- it was not imposed for a specified offence.

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".

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 (and does not have to be disclosed) if:

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

Consideration of Disclosure Information

On receipt of a DBS Disclosure containing any disclosed information, we consider the following:

- Whether the conviction or other information disclosed is relevant to the position in question
- The seriousness of the 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 the other relevant matters.
- The circumstances surrounding the offence and the explanation(s) offered by the applicant.

At interview, or in a separate discussion, we discuss any disclosed information or other matters that might be relevant to the position. Any Disclosure revealing that the applicant may be unsuitable to work with, or have regular contact with children, will mean that the applicant will not be employed or permitted to live or work on School premises.

Employment decisions based on consideration of any information provided by the DBS, will relate to the existence and extent of any risk to the welfare of children; offences that do not indicate any significant risk to children will not necessarily debar applicants from employment with the School.

Applicants wishing to dispute any information contained in a Disclosure can do so by contacting the DBS directly. In cases where an applicant would otherwise be offered a position were it not for the disputed information, the School may where practical and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the Disclosure information.

The DBS disclosure certificate

The DBS issues the DBS disclosure certificate to the individual being checked, rather than to the School. It is a condition of employment with the School that the original disclosure certificate is viewed and recorded by us prior to starting. Original certificates should not be sent by post. A convenient time and date for bringing the certificate into the School should be arranged with the HR department as soon as it has been received. Applicants who are unable to attend 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. 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. We do not keep copies of your DBS certificate, but we will record the certificate number and date of issue.

Storage, handling, use, retention and disposal of Disclosures and Disclosure information

We comply with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information, the Data Protection Act 2018 and other relevant legislation.

Disclosure information is kept securely in locked, non-portable storage containers or electronic files with access strictly controlled and limited to those who are entitled to see it as part of their duties. It is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given. It will not be passed on to anyone who is not entitled to receive it.

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary and for a maximum of six months. Once the retention period has elapsed, the School will ensure that any Disclosure information is immediately destroyed, i.e., by shredding or deleting as appropriate.

The School will not keep any copies of the DBS Disclosure but will keep a record of the date of issue of a Disclosure, the name of the person, the position and sector for which the Disclosure was requested, the unique reference number and any details of the recruitment decision taken. The School is required to keep a record of this information by the Department for Education.