

THORPE HALL

SCHOOL

Safer Recruitment and Appointments Policy

1. General

- 1.1. Thorpe Hall School ("the School") is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority. The School expects all staff, governors and volunteers to share and understand this commitment.
- 1.2. The School aims to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.
- 1.3. All queries regarding our application form and recruitment process must be directed to the Headteacher.
- 1.4. This policy describes the way in which Thorpe Hall School applies appropriate checks to ensure safe recruitment of staff – both paid and volunteer. Our policy has regard to "[Keeping Children Safe in Education](#)", (KCSiE) DfE, and adheres to ISSRs.¹ We also have regard to "[Prevent Duty Guidance: for England & Wales](#)", (March 2015).
- 1.5. An entry will be made on the Single Central Register for all current members of staff at the School, Governors and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties. All checks will be made in advance of appointment or as soon as practicable after appointment.

2. Scope of this Policy

- 2.1. The Recruitment, Selection and Disclosures Policy and Procedure herewith refers and applies to staff directly recruited and employed by the School. In the Education (Independent Schools Standards) (England) Regulations 2014, staff are defined as:

Any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer.
- 2.2. In the case of agency or contract workers, the School will obtain written confirmation from the agency or company that it has carried out the same checks as the School would otherwise perform on any individual working at the school. The School conducts identity checks on agency and contract workers on arrival in School and, in the case of agency workers which includes supply staff, the School must be provided with a copy of the appropriate level of DBS check for such staff.
3. We will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure – renewed every 3 years, right to work in the UK, barred list, prohibition, qualifications, overseas checks plus those checks set out in KCSiE as 'pre-employment' checks). The Single Central Record shows these checks have been made and we carry out our own identity check and have seen a copy of the disclosure (whether or not it discloses any information).

4. Aims

¹ Independent School Standards Regulations

The aims of the Safer Recruitment Policy are as follows:

- to help deter, reject or identify people who might be unsuitable for working with children by having appropriate procedures for appointing staff;
- To ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010;
- 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](#) - (KCSIE), the [Prevent Duty Guidance for England and Wales](#) (Prevent) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

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

5. Recruitment and Selection Procedure

5.1. Advertising

- 5.1.1. To ensure equality of opportunity, the school will advertise vacant posts to encourage as wide a field of applicants as possible, normally this entails an external advertisement which includes a Job Description and Person Specification.
- 5.1.2. Advertisements for staff vacancies will carry the words, 'Thorpe Hall School is committed to the safeguarding of children and successful candidates will be required to undergo suitability checks. These include References, Health, Right to Work in UK and DBS'. And where appropriate, the advert will also include that candidates will need to make a declaration that they are not a disqualified person under the Childcare Act 2006.
- 5.1.3. Recruitment procedures will require candidates to complete and sign the school's relevant application form on My New Term, and provide the contact details of two referees one of which must be the most recent employer.

6. Application Forms

- 6.1. The School will only accept applications from candidates completing the School's Application Form on My New Term in full. Standalone CVs will not be accepted in substitution for a completed Application Form but are permitted to be submitted alongside an Application Form. All applicants for employment will be required to complete the relevant form (on My New Term) containing questions about their academic and full employment history (in addition all applicants are required to account for any gaps or discrepancies in employment history which can be discussed during the interview if shortlisted). Applicants submitting an incomplete application form will not be shortlisted.
- 6.2. The School will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. Candidates for employed posts will receive a Job Description and Person Specification for the role applied for.
- 6.3. The application form will include the applicant's 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.
- 6.4. 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.

- 6.5. Checks will be made of previous employment history to ascertain satisfactory reasons for any gaps in employment. These checks will then be checked against references and any discrepancies discussed with the candidate.
7. All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

8. Invitation to Interview

- 8.1. The School will shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. At least two people will carry out the shortlisting exercise, consider any inconsistencies, look for gaps in employment and reasons given for them and explore all potential concerns. Short-listed applicants will then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail.
- 8.2. As part of the shortlisting process, the School will consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.
- 8.3. Shortlisted applicants will then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail. There will be a face to face interview wherever possible, and in addition to the Headteacher, a Governor will normally be present at interviews for teaching staff. The Chair of Governors should chair the panel for the Business Manager/Headteacher's appointment. The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Chair as to whether or not an interviewer should withdraw from the panel. Should the Chair have a conflict of interest, the Vice Chair shall decide whether the Chair should withdraw from the panel.
- 8.4. Shortlisted candidates will be asked to complete a self-declaration form in relation to their criminal record via My New Term or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. Applicants will be asked to sign a declaration confirming that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.
- 8.5. The School will where possible apply for references prior to the interview. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview.
- 8.6. Short-listed applicants will be asked to bring with them to the interview original versions of the following:
 - 8.6.1. A current driving licence including a photograph **or** a passport **or** a full birth certificate;
 - 8.6.2. A utility bill or financial statement issued within the last three months showing the candidate's current name and address
 - 8.6.3. Where appropriate any documentation evidencing a change of name;

8.6.4. Where applicable, proof of entitlement to work and reside in the UK.

Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

8.7. Questions to candidates will include opportunities to discover candidates' suitability to work with young people.

8.8. All candidates will be treated equally and given the same opportunities to demonstrate their suitability for the post.

8.9. All interviewers will keep contemporaneous notes which will be kept on file for the successful candidate. Interview notes for unsuccessful candidates will be retained for 6 months before being destroyed.

8.10. At least one member of the interview panel will be trained in Safer Recruitment.

9. Conditional Offer of Appointment: Pre-appointment Checks

9.1. An offer of appointment will usually be made by phone from the Headteacher or his PA or the Business Manager and followed by a letter from HR initiating the checking process.

9.2. The agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment.

9.3. Any offer to a successful candidate will be conditional upon:

9.3.1. Receipt of at least two satisfactory references (if these have not already been received);

9.3.2. Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK (if not already received);

9.3.3. A satisfactory enhanced DBS check and, if appropriate, a check of the Children's Barred List maintained by the DBS;

9.3.4. For a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State or any sanction or restriction imposed (that remains current) by the historic General Teaching Council for England before its abolition in March 2012. Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:

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

9.3.5. Verification of professional qualifications, including Qualified Teacher Status, where appropriate;

9.3.6. Verification of successful completion of statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999);

9.3.7. Where the successful candidate has worked or been resident overseas: Such further checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing the School with proof of his/her past conduct as a teacher in the form of a letter of professional standing from the professional regulating authority in the country in which s/he has worked;

9.3.8. Evidence of satisfactory medical fitness;

- 9.3.9. Confirmation that the candidate is not disqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006” OR Receipt of a signed Self-Declaration form showing that the candidate is not disqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006;
- 9.3.10. Where the successful candidate will be taking part in the management of the school, a check will be carried out under Section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Management Team and teaching heads of department; and

It is the School's practice that a successful candidate must complete a pre-employment health declaration. The information contained in the questionnaire will then be held by the School in strictest confidence and processed in accordance with the Recruitment Privacy Notice and Data Protection Policy. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed workload, extra-curricular activities, and/or layout of the School.

The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

- 9.4. A personal file checklist will be used to track and audit paperwork obtained and checks carried out as above in accordance with KCSiE. The checklist will be retained on personal files.

Candidates providing false information will be reported to the Disclosure and Barring Service

10. References

- 10.1. The School will seek the references referred to in section 9 above for shortlisted candidates (including internal applicants) and will approach previous employers for information to verify particular experience or qualifications, before interview. One of the references must be from the applicant's current or most recent employer. References must be received by a senior person with appropriate authority. If the candidate does not wish the School to take up references in advance of the interview, they should notify the School at the time of applying.
- 10.2. The School will ask all referees if the candidate is suitable to work with children and to provide facts of any substantiated safeguarding concerns or allegations that meet the harm threshold set out in Part 4 of the statutory guidance ‘Keeping Children Safe in Education’. Substantiated allegations that meet the harm threshold should be included in references. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated, or malicious should not be included in any reference.
- 10.3. The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials. The School will verify all references. Where references are received electronically, the School will ensure they originate from a legitimate source.
- 10.4. The School will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.

11. Criminal Records Policy

- 11.1. The School will refer to the Department for Education (“DfE”) document, ‘Keeping Children Safe in Education’ and any amended version in carrying out the necessary required DBS checks.
- 11.2. The School complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request, or accessed here:
<https://www.gov.uk/government/publications/dbs-code-of-practice>
- 11.3. There are limited circumstances where the school will accept a check from another educational institution which are as follows:

This is where the new member of staff (“M”) has worked in: –

- a) A school or a maintained school in England in a position which brought M regularly into contact with children or young persons;
- b) A maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or
- c) An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons,

during a period which ended not more than three months before M’s appointment.

In these circumstances the school may apply for a disclosure but is not required to do so. A new, separate barred list check will be obtained.

DBS Update Service

Where an applicant subscribes to the DBS Update Service the applicant must give consent to the school to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required.

If disclosure is delayed

A short period of work is allowed under controlled conditions, at the Head’s discretion. However, if an ‘enhanced disclosure’ is delayed, a Head may allow the member of staff to commence work:

- Without confirming the appointment;
- After a satisfactory check of the barred list if the person will be engaging in regulated activity and all other relevant checks (including any appropriate prohibition checks) having been completed satisfactorily;
- Provided that the DBS application has been made in advance;
- With appropriate safeguards taken (for example, loose supervision);
- Safeguards reviewed at least every two weeks by the Headteacher/Business Manager and member of staff;
- The person in question is informed what these safeguards are; and
- It is recommended, but is not a requirement, that a note is added to the single central register and evidence kept of the measures put in place.

12. Employment of agency Supply Staff

- 12.1. Before an agency supply teacher can begin work the school will ensure that it has written notification from the agency that:
- All checks have been completed in accordance with KCSiE (identity, enhanced DBS, right to work in the UK, Barred List, prohibition from teaching, qualifications, overseas checks, two references, declaration of medical fitness).
 - Whether the DBS check disclosed any matter or information in accordance with section 113B(6) of the Police Act 1997. If such matter is disclosed, the school must have sight of the DBS check.
 - The DBS check is either less than three months old or is from a school or FE institution they (the teacher) worked for less than three months previously.
- 12.2. The identity of supply staff must be checked on arrival at school to ensure that they are the same person on whom checks have been carried out. The supply teacher must provide photo ID and bring their DBS certificate upon arrival at the school.
- 12.3. The school will ensure that the contract it holds with the employment agency has a requirement that the agency provides the school with appropriate and compliant DBS checks.

13. Volunteers

- 13.1. Volunteers who take part in regulated activity will be subject to safer recruitment checks. Volunteers will be recruited and vetted via the process set out below
- 13.2. Volunteers will be subject to an informal recruitment process which will involve a meeting with a member of the Senior Leadership Team (SLT) to discuss the requirements of the School and the skills of the volunteer.
- 13.3. Any volunteering placement may be offered subject to the following checks, if relevant:
- an enhanced DBS certificate;
 - if the volunteer will be undertaking a regulated activity, a Barred List check;
 - evidence of their entitlement to work in the UK, where relevant;
 - a declaration that they are not disqualified from providing childcare under the Childcare (Disqualification) Regulations 2009;
 - depending on the nature of the role, the volunteer may also be asked to sign a confidentiality statement;
 - references may also be required.

14. Governors

Before the appointment of a new Governor is confirmed the Clerk to the Governors will obtain :

1. an enhanced DBS certificate (signed by the Secretary of State in the case of a new Chair of Governors);
2. if the Governor will be undertaking a regulated activity, a barred list check;
3. evidence of their entitlement to work in the UK, where relevant;
4. confirmation that they are not disqualified from acting as a Charity Trustee or Company Director, for example by virtue of an undischarged bankruptcy;
5. evidence that the Governor has not been prohibited from participating in the management of independent schools (Section 128 Check);
6. a declaration that they are not disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006 (July 2018)";
7. If the new Governor is also to be appointed as a Company Director, a completed Form AP01 will be sent to Companies House to register the appointment

15. Single Central Register

In addition to the various staff records kept in school and on individual personnel files, a single central register of recruitment and vetting checks is kept in accordance with ISSRs². This electronic file is kept up-to-date and is maintained by the HR & Compliance Officer. The Single Central Register will contain details of the following:

- All employees who are employed to work at the school
- All employees who are employed as supply staff to the school whether employed directly or through an agency
- All others who have been chosen by the school to work in regular contact with children including: volunteers, governors, peripatetic staff and other people brought into school to provide additional teaching or instruction for pupils but who are not staff members (such as sports coaches etc).

The checks listed above will be recorded on the Single Central Register along with full name, start date and the date when the checks were carried out and by whom.

16. Induction Programme

All new employees are given an induction programme which clearly identifies the School's key policies and procedures, (including the Safeguarding & Child Protection Policy, the Staff Code of Conduct, Acceptable Use of IT and KCSIE), and make clear the expectations which will govern how staff carry out their roles and responsibilities. Staff are asked to complete the "End of induction checklist" on [YourHR.Space](#) to confirm that they have read the key policies and understand their safeguarding duties.

17. Retention, Security of Records and Data Protection Obligations

We will comply with our obligations regarding the retention and security of records in accordance with the DBS Code of Practice and our obligations under our Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.

We will comply with our data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice and the Data Protection Policy.

This policy is reviewed annually by the Board of Governors

Reviewed: Feb 2025

Next Review Date: Feb 2026

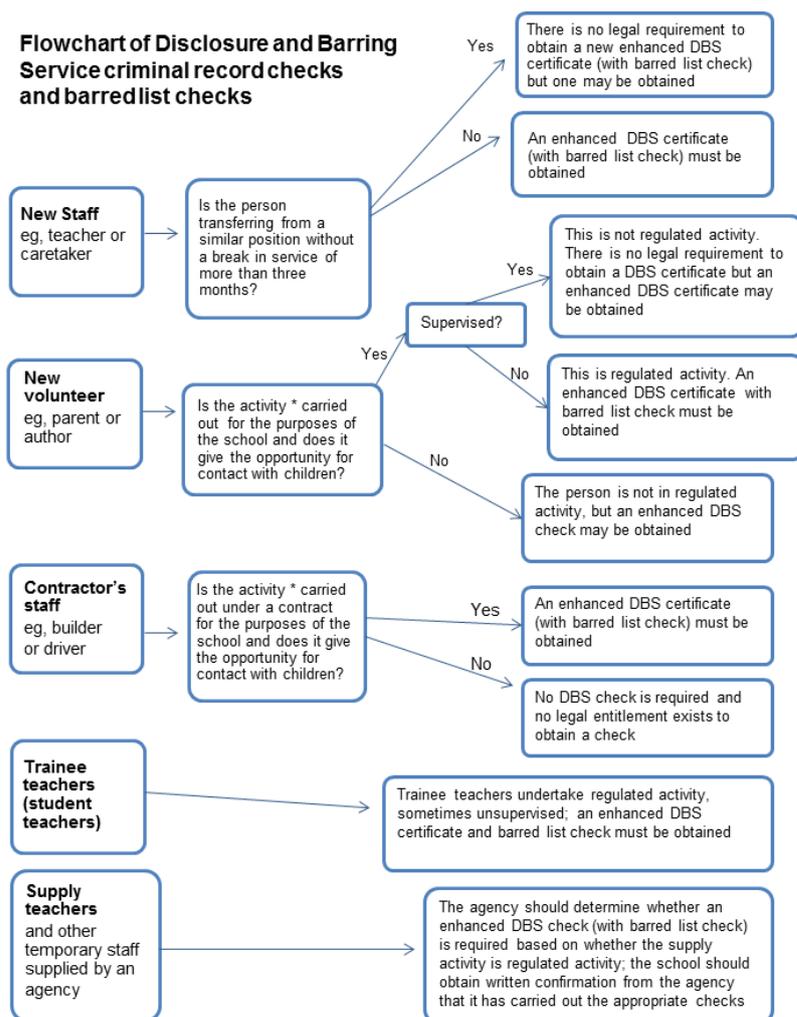
² Independent School Standards Regulations

Appendix 1

Regulated activity

The definition of regulated activity (i.e. work that a barred person must not do) in relation to children comprises, in summary:

- i. unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children; If done 'regularly' i.e.
 - frequently (once a week or more often),
 - or on 4 or more days in a 30-day period,
 - or overnight (between 2am and 6am).
- ii. work for a limited range of establishments ('specified places'), with opportunity for contact: e.g. schools, children's homes, childcare premises. Not work by supervised volunteers;
- iii. relevant personal care, e.g. washing or dressing; or health care by or supervised by a professional; Apply to any child, even if done only once.



* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'

Appendix 2

Policy on the Recruitment of Ex-Offenders

We will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. We make appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar them from employment within the School. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for us to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for us to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful for us to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the statutory guidance "[Disqualification under the Childcare Act 2006](#)".

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. We will report the matter to the Police and/or the DBS if:

- we receive an application from a disqualified person;
- we are provided with false information in, or in support of, an applicant's application; or
- we have serious concerns about an applicant's suitability to work with children.

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, we will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- whether the conviction or caution is 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020 (if yes, it will not be taken into account);
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

If the post involves regular contact with children, it is our normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence, serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is our normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it our normal policy to consider it a high risk to employ anyone who has been convicted of drink driving.