



ST ALBANS SCHOOL

Recruitment and Selection Policy

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Recruitment and Selection Policy and Procedure

1. Introduction

St Albans School ("the School") is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School recognises that, in order to achieve this, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.

The School recognises that safeguarding considerations extend beyond criminal checks and formal vetting processes and include the assessment of an individual's behaviour, attitudes, and online conduct. The School will take a pro-active and risk-based approach to identifying any concerns at the earliest stage of the recruitment process, in line with emerging safeguarding expectations and risks.

Our commitment is also to an equitable, diverse and inclusive School, with a supportive and flexible working environment for its members of staff. The School recognises the benefits of having a diverse and representative School community who value one another and the contributions everyone is able to make and encourages applicants from diverse backgrounds.

The aims of the School's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equitably and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including age, sex or sexual orientation, marital or civil partnership status, gender re-assignment, race, colour, nationality, cultural, ethnic, linguistic or national origins, disability, religion or religious belief and pregnancy and maternity (defined by the Equality Act as **protected characteristics**) or on any other grounds relating to employment discrimination legislation including, but not limited to, part time or fixed term employment rights;
- to ensure compliance with ALL relevant regulations, recommendations and guidance including:
 - the Department for Education's (DfE) Working Together to Safeguard Children (2026) and Keeping Children Safe in Education (2026) (KCSIE);
 - The Childcare Act 2006 (DUCA) and the Childcare (Disqualification) Regulations 2018;
 - the Prevent Duty Guidance for England and Wales;
 - Education (Independent School Standards) Regulations 2026 (ISSRs);
 - any guidance or code of practice published by the Disclosure and Barring Service (DBS);
 - the Home Office in respect of Immigration and right to work in the UK regulations;
- 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.

The managers involved in leading the interviewing, recruitment and selection of new staff have completed accredited Safer Recruitment in Education training in line with the DfE's Keeping Children Safe in Education guidance (2026). All employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

For the purposes of this policy, 'suitability to work with children' includes not only criminal record and regulatory information but also an individual's conduct, behaviour, attitudes, values and interactions (both offline and online), including any behaviour that may indicate a risk to children or a failure to uphold the School's safeguarding culture.

2. Data Protection

The School is legally required to carry out the pre-appointment checks detailed in this procedure. Staff and prospective staff will be required to provide certain information to the School to enable the School to carry out the checks that are applicable to their role. The School will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency. Failure to provide requested information may result in the School not being able to meet its employment, safeguarding or legal obligations. The School will process personal information in accordance with its Workforce Privacy Notice.

3. Recruitment & selection procedure

Recruitment needs are authorised by the Head and/or the Bursar. Job descriptions and/or specifications and competencies required for a post are identified prior to any active recruitment by the recruiting manager (usually by the Head for teaching posts and the Department Manager for support staff posts assisted by the Head of HR). From this the HR department will create and publicise the job vacancy advertisement.

Vacancy advertisements are placed on the school's recruitment platform My New Term and if appropriate in professional publications appropriate to the role and profession and/or local/national press. Recruitment agencies may also be used to aid the process and to ensure a suitable and diverse field of candidates. When working with recruitment agencies agreed terms and conditions of operation are agreed prior to any role being advertised.

All applicants for employment will be required to complete an **application form** via the My New Term platform containing questions about their academic and employment history and their suitability for the role. Should there be any gaps in academic or employment history, a satisfactory explanation must be provided. If desired the applicant may submit a curriculum vitae in addition to the application form but a curriculum vitae will not be accepted in place of a completed application form.

Applicants will receive a job description and/or a person specification for the role applied for. Application forms, job description/person specifications, this policy along with the School's Safeguarding Policy and Disclosure Policy are available as part of the application process.

At least two members of staff carry out the shortlisting exercise following which applicants may then be invited to attend a **formal interview** at which their relevant skills and experience will be discussed in more detail. All shortlisted applicants will be assessed at interview about their suitability to work with children. This will include consideration of their attitudes, values and

behaviours, their understanding of safeguarding responsibilities, and their willingness and ability to contribute to a safe and positive safeguarding culture, including their response to safeguarding questions and scenarios. All shortlisted candidates will be required to complete a self-declaration form prior to interview in which they will be asked to provide information about their criminal records history and other factors relevant to their suitability to work with children. This information will be considered and discussed with applicants at interview.

Prior to the final interview an online search will be carried out as part of the School's due diligence on shortlisted candidates (see section 4 for further information). This helps to identify any incidents or issues that may have happened, and are publicly available online, which the School may want to discuss with candidates at interview. Checks will only be made and recorded by members of the HR department. Checks made in this regard are only for checking suitability for working with children and not other areas of an applicant's life.

The interview also provides the candidate with an opportunity to find out more about the position and the School. The following principles are applied during the interview process:

- interview criteria (stated or implied) and interview questions are monitored to ensure they do not discriminate, either directly or indirectly;
- interview questions are defined based on necessary competencies including knowledge, skills, experience, attitudes and observable behaviours (the range of competencies may vary dependent on the role);
- interview facilities and arrangements take account of the needs of disabled candidates;
- all selection methods are regularly reviewed to ensure effectiveness, reliability and compliance with current legislation;

Interviewers receive guidance on current relevant legislation and interviewing best practice. All stages of the recruitment and selection process, including interviews, are monitored to ensure that there is no discriminatory treatment. We aim to maintain fair recruitment procedures and policies, open to all and work to minimise unconscious bias.

Specific stages of an interview process may vary dependent on the post. Unpromoted teaching posts include an interview with the Headmaster (covering questions and discussion on motivation to join St Albans School, relevant experience, skills and demonstrated competencies as defined for the role and safeguarding, and questions relating to Safeguarding, Prevent and Fundamental British Values), an interview with the Deputy Head – Teaching and Learning and Head of Department (covering subject knowledge, interest in subject and pedagogy) and an interview with the Second Master (covering pastoral and co-curricular experience and related skills).

All teaching post interviews will include an observed lesson where classroom-based teaching competencies are assessed and candidates' interaction with pupils is observed in an appropriately supervised way. Variations to this process may apply for the appointment of promoted staff for example, for a Head of Department post the Deputy Head – Teaching and Learning would be included in observing the lesson.

Support Staff candidates are interviewed by the Head of Department (in some cases this is the Head) and the Head of HR, and cover motivation to join St Albans School, relevant experience, skills and demonstrated competencies as defined for the role and Safeguarding, Prevent and Fundamental British Values related questions. The interview process for some support staff

posts may also include practical tests (including, for example, IT/technical skill tests and/or tests for other specific role related competencies).

Where possible candidates receive a tour of the School during the interview process.

An interview debrief is held following the interview process where candidate interview performance is discussed. This includes assessment of interview evidence against selection criteria, defined role related competencies covering areas of demonstrated skills and experience, attitude and motivation and observable behaviours. This informs the Head's selection decision for teaching posts or the Department Manager's selection decision for support staff posts.

If the School decides to make an **offer of employment** following the formal interview/s, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of an offer letter summarising the main terms and conditions of employment
- verification of the applicant's identity (where that has not previously been verified);
- verification of qualifications, whether professional or otherwise, which the School takes into account in making the appointment decision, or which are referred to in the application form, whether a requirement for the role or not
- verification of the applicant's employment history
- the School being satisfied that any information generated through online searches does not make the applicant unsuitable to work at the School
- receipt of two references (one of which must be from the applicant's most recent employer) which the School considers satisfactory
- for positions which involved 'teaching work, information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency which renders them unable or unsuitable to work at the School
- for applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at the School
- where the position amounts to 'regulated activity' (see section 4.4.2 below) the receipt of an enhanced disclosure from the Disclosure and Barring Service with which the School consider to be satisfactory
- where the position amounts to 'regulated activity' (see section 4.4.2 below) confirmation that the applicant is not named on the Children's Barred List*

*The School is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The School is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, the School can also carry out an enhanced DBS check on a person who would

be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently. Whether a position amounts to "regulated activity" must therefore be considered by the School in order to decide which checks are appropriate. It is however likely that in nearly all cases the School will be able to carry out an enhanced DBS check and a Children's Barred List check.

- information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at the School
- verification of the applicant's medical fitness for the role (see section 5.8 below)
- verification of the applicant's right to work in the UK
- for management positions information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at the School
- confirmation that the applicant is not disqualified from acting as a trustee / governor or senior manager of a charity under the Charities Act 2011 (see section 5.7 below)
- any further checks which the School decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.

In assessing suitability, the School will have regard to a wide range of safeguarding considerations, including (but not limited to) harmful sexual behaviour, misogyny, online conduct, extremism, inappropriate use of technology and any behaviour that may give rise to safeguarding concerns in an educational environment.

4. Artificial Intelligence

The School does not use artificial intelligence software as a decision making tool at any stage of the recruitment process, including in respect of external and internal applications and promotion proposals.

5. Pre-employment checks

The School adopts a preventative approach to safeguarding recruitment, seeking to identify potential risks at the earliest possible stage. In accordance with the recommendations set out in KCSIE, DUCA and the requirements of the ISSRs the School carries out a number of pre-employment checks in respect of all prospective staff. The definition of 'staff' includes employed workers (permanent, temporary and casual), contracted (self-employed) workers, company contracted workers (including supply staff) and volunteers in regulated activity.

In fulfilling its obligations to carry out pre-employment checks the School does not discriminate on the grounds of age, sex or sexual orientation, marital or civil partnership status, gender re-assignment, race, colour, nationality, cultural, ethnic, linguistic or national origins, disability, religion or religious belief and pregnancy and maternity (defined by the Equality Act as

protected characteristics) or on any other grounds relating to employment discrimination legislation including, but not limited to, part time or fixed term employment rights;

5.1 Online searches

In addition to the checks set out below, the School reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. In accordance with paragraph 226 of KCSIE this will include online searches on shortlisted candidates (online searches). Online searches form part of the School's proactive safeguarding due diligence and are expected to be undertaken routinely unless there is a clear and documented reason not to do so. The online searches the School carries out may include searches of internet search engines, websites and publicly available social media accounts. Applicants are not required to provide account passwords or to grant the School access to social media or professional networking account content that is not publicly available. However, if information (such as profile pictures and/or account bios) is publicly available when a social media or professional networking site account is locked and can therefore be viewed by the School, it may be taken into account as part of the online search.

Online searches will be carried out on shortlisted candidates, prior to interview (or final interview if there are more than one interview). The School will not carry out online searches as part of its initial sift of applications.

The School will determine how it approaches online searches on a case-by-case basis. However, all applicants for a role at the School will be treated consistently with regard to online searches.

Wherever possible online searches will be undertaken by a member of the HR department who will play no other part in the recruitment process (including the shortlisting exercise) or the appointment decision. In carrying out online searches the School is looking for any publicly available information about an applicant that:

- may be relevant to their suitability to carry out the role for which they have applied;
- may be relevant to their suitability to work at the School or in an education setting;
- is of a safeguarding nature, including (but not limited to):
 - reflects or indicates attitudes or behaviours inconsistent with the School's safeguarding values;
 - demonstrates harmful sexual behaviour, misogynistic attitudes, or other inappropriate conduct;
 - involves the use of technology, including AI-generated content, in a way that may raise safeguarding concerns;
- may have a negative impact on the School's reputation.

Any information generated from online searches will be entered in an 'online search results record'. Where online searches are undertaken on shortlisted applicants any relevant information generated will be provided to the interview panel for discussion with shortlisted applicants at interview. Where online searches are undertaken on the successful applicant only any relevant information generated will be discussed prior to employment commencing. All

offers of employment will be conditional upon the School being satisfied that the successful applicant is suitable to work at the School in light of any information generated from online searches.

In evaluating any online information for relevance the School will use the following criteria:

- whether the information is relevant to the position applied for;
- whether the information is relevant to the applicant's suitability to work at the School or in an education setting;
- whether the information could have an impact on the School's reputation (whether positive or negative);
- whether the information calls into doubt the applicant's willingness or ability to uphold the School's commitment to safeguarding and promoting the welfare of children;
- the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published;
- whether the information reveals a pattern of concerning behaviour; and
- the relevant circumstances and the explanation(s) offered by the applicant.

For successful candidates, the School will retain information generated through online searches for the duration of the individual's employment and in accordance with its Data Retention Policy.

For unsuccessful candidates, the School retains the information generated from online searches for six months from the date on which they are informed their application was unsuccessful, after which it will be securely destroyed.

5.2 Verification of identity, address, right to work in the UK and qualifications

All applicants who are invited to an Interview will be required to bring with them evidence of their identity, right to work in the UK, address and qualifications. The School asks for this information at interview to ensure that the person attending interview is who they claim to be, that they are permitted to work for the School if appointed and that they hold appropriate qualifications.

Identity and address: all applicants must bring with them to interview, original documents which evidence their identity and address as set out below and in the list of valid identity documents at **Appendix 1** (these requirements comply with DBS identity checking guidelines):

- one document from Group 1*; and
- two further documents from either of Group 1*, Group 2a or Group 2b, one of which must verify the applicant's current address; and

(*applicants must always provide their birth certificate as one form of identity unless there is good reason why this cannot be provided).

Where an applicant claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change. They will also be required to provide their birth certificate. The School

asks for the date of birth of all applicants in order to verify identity and check for any unexplained discrepancies in the employment and education history. The School does not discriminate on the grounds of age.

Right to work in the UK: all applicants must also bring to interview a valid form of evidence which confirms their right to work in the UK. Valid forms of evidence can be found in the Home Office 'Right to Work Checklist' (Right to work checklist (publishing.service.gov.uk)) and in some cases the evidence of your right to work in the UK can also be used as evidence of your identity and address for DBS identity checking purposes.

The School will check evidence of your right to work in the UK in accordance with the Home Office 'Code of Practice on preventing illegal working: Civil penalty scheme for employers: 6 April 2022' (which can be found here: <https://www.gov.uk/government/publications/illegal-working-penalties-codes-of-practice-for-employers>).

Qualifications: all applicants must also bring to interview original documents which evidence any educational and professional qualifications referred to in their application form and/or which the School requests.

Retention of records: the School will retain copies of the documents used to verify candidates' identity, right to work and qualifications in accordance with the School's Data Retention Policy.

5.3 Work History checks and references

A full check of completed application forms, and CVs if provided, is undertaken to verify previous employment history and to check for incomplete history (i.e. gaps in employment). References will be taken up on shortlisted applicants prior to interview where possible.

Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

All offers of employment will be subject to the receipt of a minimum of two references, which are deemed satisfactory by the School. One of which must be from the applicant's current or most recent employer. If the current/most recent employment does/did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. References from employers should be from a senior person with appropriate authority, not just a colleague or ex-colleague. Neither referee should be a relative or someone known to the applicant solely as a friend.

In compliance with regulatory requirements for Safer Recruitment, we reserve the right to contact any previous employers, but if they have not been named as referees by the applicant, we will not do so without advising the applicant first.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. All referees will be sent a copy of the job description and/or person specification for the role which the applicant has applied for. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title/duties, reason for leaving, performance, sickness* and disciplinary record;
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be unsubstantiated, unfounded, false or malicious;
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people, behaviour towards children or young people or regarding behaviour, conduct or attitudes that may be relevant to safeguarding even where these did not result in formal disciplinary action, except where the allegation or concerns were found to be unsubstantiated, unfounded, false or malicious;
- whether the applicant could be considered to be involved in 'extremism' (see the definition of 'extremism' at section 8 below).

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

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials.

The School will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant before any appointment is confirmed.

If it has not been possible to obtain prior to interview it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and/or the interview assessment form will be considered by the School. The applicant may be asked to provide further information or clarification before an appointment can be confirmed.

If factual references are received i.e. those which contain limited information such as job title and dates of employment, this will not necessarily disadvantage an applicant although additional references may be sought before an appointment can be confirmed.

The School will verify information given with the person who provided the reference and, at its discretion, may make telephone contact with referees to verify the details of the written reference provided.

The School treats all references given or received as confidential which means that third parties, including the applicant, would not usually be provided with a copy.

All references from a school must be countersigned by the Head of that school where the Head is not the referee.

All internal candidates who apply for a new role at the School will have their application assessed in accordance with this procedure. References may be taken up on internal candidates as part of

the application process and can be provided by colleagues as the School will be the most recent employer and will previously have taken up references from past employers.

5.4 Criminal records check

Prior to 29 May 2013 an enhanced disclosure contained details of all convictions on record (including those which are defined as 'spent' under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. It could also contain non-conviction information from local police records, which a chief police officer considered relevant to the role applied for at the School.

5.4.1 DBS filtering rules

With effect from 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The filtering rules developed by the DBS and the Home Office designate certain spent convictions and cautions as 'protected'. 'Protected' convictions and cautions are not included in a DBS certificate and job applicants are not required to disclose them during the recruitment process. It is unlawful for an employer to take into account a conviction or caution that should not have been disclosed. If a protected conviction or caution is inadvertently disclosed to the School during the recruitment process it must be disregarded when making a recruitment decision.

A conviction will always be disclosable if it was imposed for a 'specified offence' committed at any age. A caution issued for a 'specified offence' committed over the age of 18 will always be disclosable. However, a caution issued for a 'specified offence' committed under the age of 18 is never disclosable. 'Specified offences' are usually of a serious violent or sexual nature or are relevant for safeguarding children and vulnerable adults. The list of 'specified offences' can be found at:

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

The filtering rules work as follows:

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

A spent criminal conviction for an offence committed in the United Kingdom when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by the job applicant) if:

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

A spent caution for an offence committed when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant) if:

- (a) six years have elapsed since the date it was issued; and
- (b) it was not issued for a 'specified offence'.

For those aged under 18 at the time of an offence

A spent conviction for an offence committed when a person was under the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant) if:

- (a) five and a half years have elapsed since the date of the conviction;

- (b) it did not result in a custodial sentence; and
- (c) it was not imposed for a 'specified offence'.

A caution issued for an offence committed when a person was under the age of 18 will never be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant).

5.4.2 Regulated activity

The School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the School which amount to 'regulated activity' as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of the School will amount to 'regulated activity' if it is carried out:

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

Roles which are carried out on an unpaid / voluntary basis also amount to regulated activity if carried out as above, regardless of whether they are supervised or not.

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

5.4.3 The DBS disclosure certificate

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to the School. It is a condition of employment with the School that the **original** disclosure certificate is provided to the School as soon as possible following receipt by the applicant. Original certificates should not be sent by post. A convenient time and date for bringing the certificate into the School should be arranged. Applicants who are unable to attend at the School to provide the certificate are required to send in a certified copy by post or email as soon as possible following receipt. 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.

The School expects supply/temporary worker agencies/company contractors that are used by the School, to register with the DBS on their own account and to follow their policy or their own comparable policy. Confirmation of a satisfactory enhanced DBS check (and a copy of the DBS certificate where information is disclosed), in addition to other recruitment checks, on workers supplied by agencies/company contractors will be required before the School will commission services from any such organisation.

We make every subject of a DBS Disclosure aware of the existence of the DBS Code of Practice and the DBS Privacy Policy for applicants and direct applicants where to find copies.

Those staff who may work seasonally or who are likely to have a gap in service of three months or more are required to register with the DBS Update Service. This negates the requirement for a new DBS application at the beginning of every employment period.

The School may request a DBS check of visiting speakers prior to them visiting the School if, following relevant information searches, they deem it appropriate. Please refer to the School's Visiting Speaker Policy for further information.

5.4.4 Starting work pending receipt of a DBS disclosure

If there is a delay in receiving a DBS disclosure the Head has discretion to allow an individual to begin work pending receipt of the disclosure certificate. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once appropriate supervision has been put in place.

5.4.5 Applicants with periods of overseas residence

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. The School will take into account the 'DBS unusual addresses guide' in such circumstances.

For applicants who are living overseas, or who have lived overseas previously, obtaining a DBS certificate may be insufficient to establish their suitability to work at the School. In such cases the applicant will be required to provide additional information about their suitability from the country (or countries) in which they have lived. The School's policy is to request such information from each overseas country in which the applicant has lived for a period of three months or more in the previous five years.

When requesting such information the School has regard to relevant government guidance and will therefore always require the applicant to apply for a formal check from the country in question i.e. a criminal records check (or equivalent) or a certificate of good conduct.

The School recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances the School will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country.

In addition, where an applicant for a teaching position has worked as a teacher outside of the UK, the School will ask the applicant to obtain from the professional regulating authority of the teaching profession in each country in which they have worked as a teacher, evidence which confirms that they have not imposed any sanctions or restrictions on the applicant and that they are not aware of any reason why the applicant may be unsuitable to work as a teacher. The School will also ask shortlisted applicants (and their referees) to disclose whether they have ever been referred to, or are the subject of a sanction issued by, the regulator of the teaching profession in the countries in which they have carried out teaching work.

Sanctions and restrictions issued by the regulating authority of another country will not prevent a person from working as a teacher at the School. However, the School will take all relevant information into account in determining whether an applicant is suitable to work at the School.

The School may allow an applicant to commence work pending receipt of a formal check from a particular country if it has received a reference and/or letter of professional standing from that country and considers the applicant suitable to start work. Decisions on suitability will be based on all of the information that has been obtained during the recruitment process. Unless expressly waived by the School, continued employment will remain conditional upon the School being provided with the outcome of the formal check and it being considered satisfactory.

If no information is available from a particular country the School may allow an applicant to commence work if they are considered suitable based on all of the information that has been obtained during the recruitment process. The School will take proportionate risk-based decisions on a person's suitability in these circumstances. If the formal check is delayed and the School is not satisfied about the applicant's suitability in the absence of that information, the applicant's proposed start date may be delayed until the formal check is received.

5.5 Prohibition from teaching check

The School is required to check whether staff who carry out 'teaching work' are prohibited from doing so. The School uses the Teaching Regulation Agency Teacher Services system to check whether successful applicants are the subject of a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the Teaching Regulation Agency.

In addition, the School asks all shortlisted applicants to declare whether they have ever been referred to, or are the subject of a sanction, restriction or prohibition issued by the teaching Regulation Agency or other equivalent body in the UK.

Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the Teaching Regulation Agency (or other equivalent body) whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.

The School applies the definition of 'teaching work' set out in the Teachers' Disciplinary (England) Regulations 2012 which states that the following activities amount to 'teaching work':

- planning and preparing lessons and courses for pupils
- delivering lessons to pupils
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

The above activities do not amount to 'teaching work' if they are supervised by a qualified teacher or other person nominated by the Head. If in any doubt or if the applicant has taught previously, or may teach in future, the check will be undertaken, including for sports coaches.

5.6 Prohibition from management (S.128) check

The School is required to check whether any applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or

restricts them from being involved in the management of an independent school (a section 128 direction).

The School will carry out checks for section 128 directions when appointing applicants into management positions from both outside the School and by internal promotion. This check applies to appointments to the following positions made on or after 12 August 2015:

- Head
- teaching posts on the senior leadership team
- teaching posts which carry a departmental head role; and
- support staff posts on the senior leadership team.

The School will assess on a case-by-case basis whether the check should be carried out when appointments are made to teaching and support staff roles which carry additional responsibilities.

All individuals who are appointed to the governing body will be subject to a section 128 direction check.

The relevant information is contained in the enhanced DBS disclosure certificate (which the School obtains for all posts at the School that amount to regulated activity). It can also be obtained through the Teaching Regulation Agency Teacher Services system. The School will use either, or both, methods to obtain this information.

In addition, the School asks all shortlisted applicants to declare whether they have ever been the subject of a referral to the Department for Education or are subject to a section 128 direction or any other sanction which prohibits, disqualifies or restricts them from being involved in the management of an independent school.

Where an applicant is not currently prohibited from management but has been the subject of a referral to, or hearing before, the Department for Education or other appropriate body whether, or not, that resulted in the imposition of a section 128 direction or other sanction, or where a section 128 direction or other sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.

5.7 Disqualification from acting as a charity trustee or senior manager

5.7.1 Background

Under the Charities Act 2011 it is a criminal offence for a person to act as a trustee or senior manager of a charity when disqualified from doing so. The Charities Act 2011 sets out the grounds on which a person can be disqualified from acting as a trustee or senior manager. These include various spent and unspent criminal offences and other sanctions.

5.7.2 Who is covered

A person is considered to be a charity trustee if they are one of the people who have general control and management of the administration of the charity. In an independent school the trustees will typically be the governors of the school. Senior managers include those employees who report directly to the charity trustees or have responsibility for the overall management and

control of the charity's finances. At the School the disqualification rules will be applicable to all governors, the Head, Bursar and potentially other senior staff to report directly to the governors.

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

5.7.3 Self-declaration

All those who are covered by the disqualification rules are required to complete a self-declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria.

A failure to disclose relevant information, or the provision of false information, which subsequently comes to the School's attention may result in the termination of an appointment as a governor or senior manager or the withdrawal of an offer of employment and may also amount to a criminal offence.

All those who are required to complete a self-declaration form are also under an ongoing duty to inform the School if there is a change in their circumstances that results or may result in them becoming disqualified from acting as a governor or senior manager.

5.7.4 Checks by the School

To ensure that it has accurate and up to date information the School will also check the following registers in respect of each governor and senior manager who is already in post or is appointed in future:

- the Bankruptcy and Insolvency Register;
- the register of disqualified directors maintained by Companies House; and
- the register of persons who have been removed as a charity trustee.

5.7.5 Waiver

A person who discloses that one or more of the disqualification criteria is applicable to them may apply to the Charity Commission for a waiver of the disqualification.

The School may at its absolute discretion withdraw an offer of employment for a senior manager or cease or terminate an appointment to the governing body if a waiver application becomes necessary or is rejected by the Charity Commission. The School is under no obligation to await the outcome of a Charity Commission waiver application before taking such action.

5.8 Medical Fitness

The School is legally required to verify the mental and physical fitness of anyone to be appointed to a post at the School **after** an offer of employment has been made but **before** the appointment is confirmed.

It is the School's practice that all applicants to whom an offer is made must complete a Health Questionnaire. Information from a completed questionnaire would be reviewed against the job

description for the particular role, together with any details of any other physical or mental requirements of the role i.e. proposed timetable, extra-curricular activities, technical aspects of the role, layout of the School etc. If there is any doubt about an applicant's fitness to fulfil the role the applicant will be referred for a consultation with the School's Occupational Health Consultant, and the School will consider reasonable adjustments in consultation with the applicant. The School may also seek further medical advice from a specialist or request that the applicant undertake a full medical assessment.

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

6. Contractors and Agency Staff

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

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

The School will independently verify the identity of individuals supplied by contractors or an agency in accordance with section 5.2 above and requires the provision of the DBS disclosure certificate before those individuals can commence work for/at the School.

7. Volunteers

The School will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of the School (the definition of regulated activity set out in section 5.4.2 above will be applied to all volunteers).

The School will request an enhanced DBS disclosure without Children's Barred List information on all volunteers who do not undertake regulated activity.

Under no circumstances will the School permit a volunteer whose DBS check remains outstanding to have unsupervised contact with pupils.

It is the School's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the School for three consecutive months or more. These volunteers who are likely to be involved in activities with the School on a regular basis may be required to sign up to the DBS update service as this permits the School to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition, the School will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):

- formal or informal information provided by staff, parents and other volunteers,
- character references from the volunteer's place of work or any other relevant source; and
- an informal safer recruitment interview.

8. Visiting Speakers and the Prevent Duty

The Prevent Duty Guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

The School is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the School or perform any other regular duties for or on behalf of the School.

All visiting speakers will be subject to the School's usual visitors and security protocols. This will include signing in and out at Reception, the wearing of a visitors' badge at all times and being escorted by a fully vetted member of staff between appointments.

The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and / or permit a speaker to attend the School. In doing so the School will always have regard to the visitors and security protocols, the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

'Extremism' is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces"

In fulfilling its Prevent Duty obligations the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age.

9. Policy on recruitment of ex-offenders

9.1 Background

The School will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. The School makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the School. Each case will be decided on its merits in accordance with the objective assessment criteria set out in section 9.2 below.

All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions, including those which would normally be considered "spent" except those received for an offence committed in the UK if it has been filtered in accordance with the DBS filtering rules (see 5.4.1 above).

A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for the School to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the School. The School will make a report to the police and / or the DBS if:

- it receives an application from a barred person
- it is provided with false information in, or in support of an applicant's application; or
- it has serious concerns about an applicant's suitability to work with children.

9.2 Assessment criteria

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question
- the seriousness of any offence or other matter revealed
- the length of time since the offence or other matter occurred
- whether the applicant has a pattern of offending behaviour or other relevant matters
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the applicant.

If the post involves regular contact with children, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:

- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or
- serious class A drug related offences, robbery, burglary, theft, deception or fraud.

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

If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

9.3 Assessment procedure

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will carry out a risk assessment by reference to the criteria set out above.

If an applicant wishes to dispute any information contained in a disclosure, they can do so by contacting the DBS direct. In cases where the applicant would otherwise be offered a position

were it not for the disputed information, the School may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

9.4 Retention and security of disclosure information

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

10. Whistleblowing

All staff are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of employment in accordance with the School's policies (including the Whistleblowing Policy, the Safeguarding Policy and the Staff Code of Conduct). All staff receive training so that they understand the School's expectations. Safeguarding children is at the centre of the School's culture and is accordingly considered formally during staff performance and development reviews and finally when staff leave the School as part of the exit questionnaire/interview process.

11. Referrals to the DBS and Teaching Regulation Agency

This policy is primarily concerned with the promotion and practice of safer recruitment. However, applicants should also be aware that the School has legal responsibilities to fulfil when employment comes to an end. In particular, the School has a legal duty to make a referral to the DBS where:

- an individual has applied for a position at the School despite being barred from working with children; and/or
- an individual has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

The DBS will consider whether to impose sanctions on that individual which may restrict or prevent them from working with children in future.

In addition, if a teacher is dismissed because they are found to have committed serious misconduct, or they have breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will make a referral to the Teaching Regulation Agency.

The Teaching Regulation Agency will consider whether to impose a prohibition from teaching order.

12. Queries

If an applicant has any queries on how to apply for a post at the School, they should contact the Head of HR.

Appendix 1 List of valid identity documents

Group 1: primary identity documents

- current valid passport
- biometric residence permit (UK)
- current driving licence photocard - full or provisional (UK / Isle of Man and Channel Islands)
- birth certificate - issued within 12 months of birth (UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces)
- adoption certificate (UK and Channel Islands)

Group 2a: trusted government documents

- current driving licence: photocard - full or provisional (all countries outside the UK excluding Isle of Man and Channel Islands)
- current driving licence paper version if issued before 1998 - full or provisional (UK / Isle of Man and Channel Islands)
- 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 (UK)
- fire arms licence (UK, Channel Islands and Isle of Man)

All driving licences must be valid.

Group 2b: Financial and social history documents

- mortgage statement (UK)**
- bank / building society statement (UK and Channel Islands)*
- bank / building society statement (countries outside the UK)*
- bank / building society account opening confirmation letter (UK)*
- credit card statement (UK)*
- financial statement - e.g. pension or endowment (UK)**
- P45 / P60 statement (UK and Channel Islands)**
- council tax statement (UK and Channel Islands)**
- letter of sponsorship from future employment provider (non UK only; valid only for applicants residing outside the UK at the time of application; must be valid at time of application)
- utility bill (UK; not mobile telephone bill)*
- benefit statement - e.g. child benefit, pension (UK)*
- a document from central or local government/ government agency / local council giving an entitlement - e.g. from the Department for Work and Pensions, the Employment Service , HM Revenue & Customs (UK and Channel Islands)*
- EEA national ID card (must be valid at time of application)
- Irish passport card (cannot be used with an Irish passport; must be valid at time of application)
- cards carrying the PASS accreditation logo (UK, Isle of Man and Channel Islands; must be valid at time of the application)
- letter from Head or College Principal (UK; for 16-19 year olds in full-time education. This is only used in exceptional circumstances if other documents cannot be provided; must be valid at time of application).

Note

If a document in the list of valid identity documents is:
denoted with * - it should be less than three months old
denoted with ** - it should be less than 12 months old