



SAFER RECRUITMENT POLICY

This policy will be reviewed annually or in response to changes in legislation		
Created	January 2024	Head of HR, Head of Compliance, Chief People Officer, HR Manager
Updated	November 2025	HR Director
Approved	November 2025	Chief People Officer

Thomas's London Day Schools operates as a united group of schools with a similar ethos and values and as such is referred to as a singular body.

This Policy should be read in conjunction with Appendix 1: Policy on the recruitment of ex-offenders.

1. INTRODUCTION

- 1.1. Thomas's London Day Schools (the Group) 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.
- 1.2. Thomas's 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 on the application and recruitment process should be directed to the HR team by emailing hr@thomas-s.co.uk.
- 1.4. The central HR team manages the recruitment process at Thomas's however where the appointment is a school-based role, the School provides support.
- 1.5. Each school has a Single Central Register and a separate register is held for Cross-School staff, including the proprietors and members of the Board. An entry will be made on the relevant Single Central Register for all current members of staff at the School and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.
- 1.6. Thomas's London Day Schools is the proprietor and responsible for the management of the schools.
- 1.7. All checks will be made in advance of appointment or as soon as practicable after appointment.

2. SCOPE OF THIS POLICY

- 2.1. The Safer Recruitment Policy herewith refers and applies to staff directly recruited and employed by Thomas's. 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 should set out their safeguarding requirements in the contract between the organisation and the School must obtain written confirmation from the agency or company that it has carried out the same checks as the Group would otherwise perform on any individual working at the school (or who will be providing education on the school's behalf, including through online delivery). The School conducts identity checks on agency and contract workers on arrival 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.
- 2.3. The School will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure, right to work in the UK, Children's barred list, prohibition, qualifications, overseas checks

plus, those checks set out in KCSIE as 'pre-employment' checks. The Single Central Register shows these checks have been made and the School carries out its own identity check and has seen a copy of the disclosure (whether or not it discloses any information).

- 2.4. In respect of contractors, unchecked contractors will under no circumstances be allowed to work unsupervised in School. The School will determine the appropriate level of supervision depending on the circumstances.
- 2.5. Any staff who TUPE transfer into the Group's staff will be required to undertake the statutory requirements with regard to safer recruitment checks.
- 2.6. If staff are transferred under TUPE (gap of three months or less and information complete) information will be passed to the new employer and a note made on the Single Central Register that details have been accepted under TUPE.

3. APPLICATION FORM

- 3.1. The Group will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms, but are permitted to be submitted alongside an Application Form.
- 3.2. The Group will make candidates aware that all posts 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.
- 3.3. 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.
- 3.4. The successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service ("DBS") for the position and, where appropriate, a check of the Children's Barred List will be undertaken. Any offer of employment will be conditional on obtaining such satisfactory checks. Additionally, successful applicants should be aware that they are required to notify the school immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration
- 3.5. The statutory guidance "Disqualification under the Childcare Act 2006" applies to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.
- 3.6. The Group takes its responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect their suitability to work with children must notify the Head or Head of HR immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

- 3.7. Staff and/or successful candidates who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Head of HR for more details.
- 3.8. If the candidate is currently working with children, on either a paid or voluntary basis, the Group will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.
- 3.9. If the candidate is not currently working with children but has done so in the past, the Group will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the Group will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the Group may request character references which may include references from the candidate's school or university.
- 3.10. 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 Group if they have been appointed, and a possible referral to the police and/or DBS.

4. INVITATION TO INTERVIEW

- 4.1. Applicants will be shortlisted 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.
- 4.2. As part of the shortlisting process, an online search on shortlisted candidates will be carried as part of its due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which may be explored with an applicant at interview. This forms part of the Group'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.
- 4.3. Shortlisted applicants will then be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail.
- 4.4. Shortlisted candidates should be asked to complete a self-declaration form in relation to their criminal record 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.

- 4.5. Where possible, references will be obtained prior to interview. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview.
- 4.6. The HR department must be contacted beforehand to discuss any overseas candidate's right to work status.
- 4.7. All formal interviews will have a panel of at least two people chaired by the Head or another designated senior member of staff. It is recommended best practice that at least one person on the appointment panel will have undertaken safer recruitment training. The Proprietors should chair the panel for any Head or Executive leadership appointments.
- 4.8. The interview process may include a formal interview, safeguarding interview, lesson observation, in-tray exercise and tour.
- 4.9. 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.
- 4.10. The interview will explore suitability to work with children including where appropriate, any discussion of information shared by a candidate in their self-declaration form.
- 4.11. In most instances the interview will be conducted in person, however where a candidate cannot easily attend a face-to-face interview (if they are overseas, for example), an online or telephone interview may also be carried out, as the first stage of the interview process.
- 4.12. Where the initial interview is held remotely (either by phone or online) and the candidate is successful in being offered a role, a second interview must be held in person before they commence employment with Thomas's.
- 4.13. All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.
- 4.14. All candidates invited to interview must also bring with them:
- A current driving licence including a photograph or a passport and a full birth certificate (where this is available);
 - A utility bill or financial statement issued within the last three months showing the candidate's current name and address;
 - Where appropriate any documentation evidencing a change of name;
 - 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.
- 4.15. Candidates with a disability who are invited to interview should inform the Group of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

5. CONDITIONAL OFFER OF APPOINTMENT: PRE-APPOINTMENT CHECKS

- 5.1. Any offer to a successful candidate will be conditional upon:
- 5.1.1. Receipt of at least two satisfactory references (if these have not already been received);
 - 5.1.2. Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK (if not already received);
 - 5.1.3. A satisfactory enhanced DBS check and, if appropriate, a check of the Children's Barred List maintained by the DBS;
 - 5.1.4. Trans and non-binary applicants have the choice not to have gender or name information disclosed on their DBS certificate which could reveal historical details relating to their identity. Further details on how to apply through this route can be found here <https://www.gov.uk/guidance/transgender-applications>;
 - 5.1.5. 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;
 - 5.1.6. Verification of professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service will be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation;
 - 5.1.7. Where the successful candidate has worked or been resident overseas for more than three months in the past ten years: Such further checks and confirmations as the Group may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing the Group with proof of their 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;
 - 5.1.8. Evidence of satisfactory medical fitness;
 - 5.1.9. 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";
 - 5.1.10. Where the successful candidate will be taking part in the management of the Group or a 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 members of the Board, Senior Management Team and teaching heads of department; and

- 5.1.11. It is the Group's practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire, plus any follow up information or recommendations from Occupational Health will then be held by the Group 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 workplace.
- 5.2. The Group 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.

6. REFERENCES

- 6.1. The Group will seek the references referred to in section 5 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 Group to take up references in advance of the interview, they should notify the Group at the time of applying.
- 6.2. The Group 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.
- 6.3. The Group 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 Group will verify all references. Where references are received electronically, the Group will ensure they originate from a legitimate source via verbal confirmation - usually by way of a telephone call.
- 6.4. The Group 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.
- 6.5. References will be treated confidentially but may be disclosed in certain circumstances as required or permitted by law.

7. CRIMINAL RECORDS POLICY

- 7.1. The Group will refer to the Department for Education ("DfE") guidance, 'Keeping Children Safe in Education' and any amended version in carrying out the necessary DBS checks.

- 7.2. The Group complies with the provisions of the DBS Code of Practice, a copy of which may be accessed here:
<https://www.gov.uk/government/publications/dbs-code-of-practice>.
- 7.3. There are limited circumstances where the Group will accept a check from another educational institution.
- 7.3.1. 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.
- 7.3.2. The date of issue of the DBS certificate must be dated within twelve months of the new member of staff's proposed start date.
- 7.4. In these circumstances the school may apply for a disclosure but is not required to do so. A new, separate Children's Barred List check will be obtained.
- 7.5. *DBS Update Service*
- 7.5.1. 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 Children's Barred List check will still be required.
- 7.5.2. If when checking the update service, it indicates that there is new information since the original DBS certificate was produced, then a new DBS must be requested.
- 7.6. 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 Head and line manager;
 - 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.
- 7.7. All Thomas's employees are required to complete an annual self-declaration and disclosure form. Details of any criminal records since the date of their last DBS check should be disclosed on this form with written details provided confidentially to the Head (or CPO for centrally employed staff).
- 7.8. Employees are required to notify the Head (or CPO for centrally employed staff) immediately if they are subject to any criminal proceedings (including arrest, charge, conviction, caution or bind over) whilst in Thomas's employment.
- 7.9. Disciplinary action, including dismissal may be considered if there has been criminal or non-criminal activity which affects the employee's suitability for continued employment or has unacceptable repercussions for Thomas's.

8. INTERNAL APPLICANTS (INCLUDING PROMOTIONS)

- 8.1. This applies to staff moving to a new role in their current School, or to another within the Group.
- 8.2. References may be sought to support applications
- 8.3. Where an internal promotion results in appointment to the role of Head of Department or above, an s. 128 Prohibition from Management check will be carried out
- 8.4. Other information may be requested as the Group identifies as appropriate

9. MEMBERS OF THE BOARD OF DIRECTORS AND NOMINATED GOVERNORS

- 9.1. Checks on members of the Board of Directors and nominated Governors will be carried out and recorded on the SCR. These checks include:
 - 9.1.1. Identity check
 - 9.1.2. Right to work
 - 9.1.3. Enhanced DBS, (with barred list if in regulated activity)
 - 9.1.4. s.128 Prohibition from Management check
 - 9.1.5. Overseas checks (where appropriate)
- 9.2. A DBS certificate, countersigned by the Secretary of State is necessary for the Chair of the Proprietor Body.

10. INDIVIDUAL SELF-EMPLOYED CONTRACTORS

- 10.1. The Group will assess the appropriate level of checks required for self-employed contractors on a case by case basis depending on whether the contractors are engaging in regulated activity and have the opportunity for regular contact with children. If the contractor is in regulated activity, they would be required to complete the same vetting checks as for staff.

11. VOLUNTEERS (INCLUDING PARENT HELPERS)

- 11.1. Volunteers bring with them a range of skills and experience that can enhance the learning opportunities of pupils. The schools therefore, welcome and encourage volunteers from the local community and parent body to assist in its day to day running. The kinds of activities that volunteers may assist with are hearing pupils read, working with small groups of pupils to assist them in their learning, working alongside individual pupils, or accompanying school visits.
- 11.2. Prior to engaging a volunteer to carry out any activities for or on behalf of the Group, the Head of Department with responsibility for the volunteer appointment will complete a risk assessment so that a decision can be made as to what vetting checks are required. The HR department will then carry out the appropriate vetting checks and details of the risk assessment will be recorded.
- 11.3. Under no circumstances will a volunteer, in respect of whom no safeguarding checks have been undertaken, be left unsupervised with children or allowed to engage in regulated activity.
- 11.4. The School will provide volunteers with training on appropriate topics relevant to their placement.

12. RECORD KEEPING

- 12.1. The School will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.
- 12.2. The School will comply with its 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.

13. LEGISLATION AND GUIDANCE

DfE Statutory Guidance Keeping children safe in education (September 2025)

DfE EYFS Statutory Framework for Group and School-Based Providers (July 2025)

Disqualification from the Childcare Act 2006

Equality Act 2010

APPENDIX 1: POLICY ON THE RECRUITMENT OF EX-OFFENDERS

1. INTRODUCTION

- 1.1. Thomas's London Day Schools (the Group) will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. The Group makes appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar him/her from employment within the Group. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.
- 1.2. 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.
- 1.3. Under the relevant legislation, it is unlawful for the Group 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 the Group 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 the Group to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006".

2. PROCEDURES

- 2.1. It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the Group. The Group will report the matter to the Police and/or the DBS if:
 - the Group receives an application from a disqualified person;
 - is provided with false information in, or in support of an applicant's application; or
 - the Group has serious concerns about an applicant's suitability to work with children
- 2.2. 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 DBS check, the Group 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.
- 2.3. If the post involves regular contact with children, it is the Group'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, serious class A drug related offences, robbery, burglary, theft, deception or fraud.
- 2.4. If the post involves access to money or budget responsibility, it is the Group'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.
- 2.5. If the post involves some driving responsibilities, it is the Group's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving.

3. DATA PROTECTION

- 3.1. The Group will comply with its 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.

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 - in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
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- 2.3. If the post involves regular contact with children, it is the Group'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, serious class A drug related offences, robbery, burglary, theft, deception or fraud.
- 2.4. If the post involves access to money or budget responsibility, it is the Group'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.
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