



SAFER RECRUITMENT, SELECTION AND DISCLOSURES POLICY AND PROCEDURE

This policy, which applies to the whole school, inclusive of boarding, is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the school Compliance Officer.

Owner: HR Director

Approving Body: Governance and Compliance Committee

Date of last Review: September 2026

Date of next Review: September 2027

Linked Policies, Procedures and Resource Materials:

- Safeguarding and Child Protection Policy
- Staff Handbook
- Data Protection Policy
- Data Retention and Storage Policy
- Privacy Notice – Staff
- Privacy Notice – Recruitment
- Recruitment of Governors and Volunteers Policy

GENERAL

Woldingham 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 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.

All queries regarding the Application Form and recruitment process must be directed to hr@woldinghamschool.co.uk.

An entry will be made on the Single Central Record for all current members of staff at the School, the proprietorial body and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.

The Proprietor is the Board of Governors of the School.

All checks will be made in advance of appointment or as soon as practicable after appointment.

REGULATORY FRAMEWORK, MONITORING AND REVIEW

The School is committed to carrying out safer recruitment practices in accordance with all applicable legislation, statutory guidance and regulatory requirements, including:

- Keeping Children Safe in Education (KCSIE) (current edition);
- Working Together to Safeguard Children;
- The Education (Independent School Standards) Regulations;
- The Childcare Act 2006 and the Statutory Framework for the Early Years Foundation Stage (where applicable);
- The National Minimum Standards for Boarding Schools;
- The Prevent Duty Guidance for England and Wales;
- Data protection legislation and UK GDPR.

The Governing Body has overall responsibility for ensuring that procedures for safer recruitment are compliant, effectively implemented and regularly reviewed. This policy will be reviewed annually, or earlier where changes in legislation, statutory guidance or operational requirements make this necessary.

Those involved in recruitment and selection processes will receive appropriate safeguarding and safer recruitment training, including training on relevant safeguarding responsibilities and current statutory requirements.

SCOPE

This Policy 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. See Recruitment of Governors and Volunteers Policy for further details.***

The aims of the School's Safer 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 equally and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;

NATIONAL MINIMUM STANDARDS (NMS) REQUIREMENTS

In addition to the recruitment requirements contained within this policy, the School complies with the National Minimum Standards for Boarding Schools.

The School will ensure that:

- persons living in boarding accommodation who are not employed by the School are subject to appropriate safeguarding measures in accordance with current regulatory requirements;
- where required, suitability checks are undertaken on adults residing in boarding accommodation;
- boarding staff receive appropriate safeguarding and boarding-specific induction and training;
- arrangements exist to ensure that students are safeguarded within the boarding environment at all times;
- any accommodation provided by the School for boarding purposes is subject to appropriate safeguarding oversight.

The Head and designated safeguarding personnel will ensure that boarding arrangements continue to meet all safeguarding and regulatory requirements applicable to boarding schools.

Senior management disqualification

Certain individuals are automatically disqualified from acting in senior management positions within a charity. Whether an individual falls into the category of a senior management position is judged using the following criteria:

- A person who is accountable only to the governors, and who carries overall responsibility for the day-to-day management and control of the charity. At Woldingham School this would be the Head.
- A person who is accountable only to the Head or the governors, and who is responsible for the overall management and control of the charity's finances. At Woldingham School this would be the Director of Finance and Operations (DFO).

Being disqualified means that a person cannot take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or 'waived') the disqualification.

Agency and third-party staff

In the case of agency staff, the School will obtain written confirmation from the 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). In respect of the enhanced DBS check, the School will ensure that the written notification from the agency confirms that the certificate has been obtained either by them or another such business. If the check discloses any matter or information, we will obtain a copy of the certificate before the individual starts work and undertake a risk assessment as to whether that individual is suitable to work at the school. The School will also confirm that the enhanced DBS certificate was issued no more than three months before the individual is due to begin work, unless the individual has worked in a school in England during those three months (the 'three-month rule') or is registered with the DBS Update Service (in which case a status check should be carried out instead).

The School will always check the identity of agency staff members on arrival.

The Single Central Record will record that these checks have been conducted and detail any necessary information in line with KCSIE.

Contractors

Where the School uses contractors to provide services, it sets out the School's safeguarding requirements in the contract between the contractor (or the contractor's organisation) and will ensure that any contractor (or employee of the contractor) who is to work at the School has been subject to the necessary safer recruitment checks in accordance with KCSIE. Where an individual working at the School is self-employed, the School will either obtain the DBS check itself or request to see an existing certificate to ensure it is at the level required. It is school policy to undertake a child's barred list check on all contractors who are working at the school on an unsupervised basis, with the appropriate permission from the individuals concerned.

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.

The School will always check the identity of contractors on arrival.

The Single Central Record will record that these checks have been conducted and detail any necessary information in line with KCSIE.

Staff transferring under TUPE

Any staff who TUPE transfers into the School's staff will be required to undertake the statutory requirements with regard to safer recruitment checks. 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 Record that details have been accepted under TUPE.

RECRUITMENT GOVERNANCE AND SAFER RECRUITMENT TRAINING

The School is committed to maintaining a strong safeguarding culture throughout its recruitment and employment practices.

At least one person involved in the recruitment process will have completed appropriate safer recruitment training in accordance with current statutory guidance.

Those responsible for recruitment will:

- maintain an attitude of professional curiosity;
- explore any gaps, anomalies or discrepancies identified during selection processes;
- assess candidates' suitability to work with children;
- ensure that safeguarding is embedded throughout all stages of recruitment and selection.

Governors, leaders and managers responsible for recruitment oversight will monitor compliance with this policy and seek assurance that safeguarding requirements are being consistently applied.

ADVERTISEMENTS

Woldingham School is clear about the information required when defining the role (through the job or role description and person specification). For any given post, the job description and person specification includes the skills, abilities, experience, attitude, and behaviours required for the post, its safeguarding responsibilities, including the extent to which they will be in contact with children (engaging in regulated activity). Woldingham School's adverts include its commitment to safeguarding, promoting the welfare of students and also makes clear that safeguarding checks will be undertaken.

APPLICATION FORM

The School 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.

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.

Applicants are required to provide:

- personal details, current and former names, current address and national insurance number;
- details of their present (or last) employment and reason for leaving;
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
- full education history;
- qualifications, the awarding body and date of award;
- details of referees/references (see below for further information), and;

- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

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.

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 us 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.

The School takes its responsibility to safeguard children very seriously and inform any staff member and/or successful candidate who is aware of anything that may affect their suitability to work with children that they must notify HR Director immediately. This will include notification of any arrests, charges, convictions, cautions, court orders, reprimands or warnings they may receive .

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 or the DFO for more details.

The School will ask current and previous employers 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.

Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university.

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.

INVITATION TO INTERVIEW

Woldingham 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.

The School requires only those candidates who have been shortlisted to complete a self-

declaration of their criminal record or information that would make them unsuitable to work with children. This would include, for example:

- if they have a criminal history;
- if they are included on the children's barred list;
- if they are prohibited from teaching;
- if they are prohibited from taking part in the management of an independent school;
- information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted;
- if they are known to the police and children's local authority social care;
- if they have been disqualified from providing childcare
- any relevant overseas information.

Applicants are required 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. The purpose of this self-declaration is so that candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received. Woldingham:

- ensures that at least two people carry out the shortlisting exercise, and, for consistency, that those who shortlist are part of the interview panel;
- considers any inconsistencies and looks for gaps in employment and reasons given for them, and
- explores all potential concerns.

As part of the shortlisting process, a search (which may include but is not limited to a search via an online search engine and may also extend to social media and other publicly accessible online sources) will be carried out on shortlisted candidates as part of our due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which we may want to explore with an applicant at interview. This forms part of our 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. If a safeguarding concern is raised as part of this online search, candidates may be withdrawn from the process, or the matter shall be addressed at interview to ascertain further information.

Shortlisted applicants will then be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail.

If a shortlisted applicant is invited to attend a formal interview, questions will be asked about their relevant skills and experience. To safeguard our students, the interview panel will explore:

- *The candidate's attitude toward children:* This may be assessed through their personal statement and through questions that probe their values, beliefs and ethics.

- *The candidate's motivation to work with children:* Questions on how they have applied their vision for education and learning and development of the child and young person, can help you assess their motivation.
- *Their ability to form relationships and retain personal boundaries:* This will be assessed through focused questions and complementary activities, such as group exercises or occupational personality questionnaires.
- *Their emotional resilience in working with challenging behaviours and their attitudes in managing discipline and towards authority:* Questions asking them to draw on previously difficult situations and how they managed these will help us assess this.
- *Their ability to support the school's agenda for safeguarding and promoting the welfare of children:* Clarification on their understanding of the school's view on child protection policies and procedures, questions that ask them to explain when and how they have had to work within such procedures and policies.
- Gaps in the candidate's employment history and explanation of repeated changes in career are to be discussed and clarified.
- Concerns or discrepancies arising from the information provided by the candidate or referees.
- If for any reason references have not been provided before the interview the candidate will be given the opportunity to declare/discuss anything that may come to light on the collection of references.
- If the candidate wishes to declare anything in light of the requirement for DBS checks to be made.

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.

The School will, where possible, obtain references 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.

All formal interviews will have a panel of at least two people, with at least one safer recruitment trained interviewer.

The Chair of Governors should chair the panel for the DFO's/Head'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.

The interview will be conducted in person, where possible, and the areas which it will explore will include suitability to work with children including where appropriate, any discussion of information shared by a candidate in their self-declaration form.

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.

All candidates invited to interview will be asked to also bring with them:

- A current driving licence including a photograph or a passport and a full birth certificate;
- 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; and
- Where applicable, proof of entitlement to work and reside in the UK.

Documentary evidence of all educational, professional, and other qualifications declared on the application form. Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

Candidates with a disability who are invited to interview should inform us of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

CONDITIONAL OFFER OF APPOINTMENT: PRE-APPOINTMENT CHECKS

Any offer to a successful candidate will be conditional upon:

1. Receipt of at least two satisfactory references (if these have not already been received). The School will seek references which cover five years of work history;
2. Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK (if not already received);
3. A satisfactory enhanced DBS check and, if appropriate, a check of the Children's Barred List maintained by the DBS;
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 students;
 - Delivering and preparing lessons to students;
 - Assessing the development, progress and attainment of students; and
 - Reporting on the development, progress and attainment of students;

5. Verification of professional qualifications, including Qualified Teacher Status (QTS), where appropriate;
6. Verification of successful completion of a statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999);
7. Evidence of satisfactory medical fitness;
8. 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. For a candidate to be employed into a senior management position as set out above under “Scope of this Policy”, receipt of a signed “senior charity manager positions: automatic disqualification declaration” confirming that the candidate is not disqualified from acting in a senior management position for a charity in accordance with the automatic disqualification rules for charities; and
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 Leadership Team, the wider leadership team (such as ALT, PLT and BLT), and teaching heads of department.
11. Where the successful candidate has worked or been resident overseas: Such individuals must undergo the same checks as all other staff at Woldingham, including obtaining (via the applicant) an enhanced DBS certificate (including children’s barred list information) even if the individual has never been to the UK. Additionally, the School makes any further checks it thinks appropriate, so that relevant events that have occurred outside of the UK can be considered. Following the UK’s exit from the EU, Woldingham applies the same approach for any individuals who have lived or worked outside the UK regardless of whether it was in an EEA country or the rest of the world. These checks include, where available, criminal records checks for overseas applicants (please refer to the Home Office guidance found on [GOV.UK](https://gov.uk)).

The School seeks to obtain a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the [Regulated Professions database](#). Whilst the safeguarding and qualified teacher status (QTS) processes are different it is likely that this information will be obtained from the same place therefore applicants can also contact the [UK Centre for Professional Qualifications](#) who will signpost them to the appropriate EEA regulatory body.

Where this information is not available, Woldingham seeks alternative methods of checking

suitability, and may undertake a risk assessment and additional reference that supports an informed decision on whether to proceed with the appointment. Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, Woldingham always considers the circumstances that led to the restrictions being imposed when considering a candidate for employment. The School refers to the DfE guidance: [Recruit teachers from overseas](#).

Not all countries provide criminal record information, and where they do, the nature of this information varies from country to country. Woldingham bears this in mind and is also aware that the criteria for disclosing offences in other countries often have a different threshold than those in the UK. The School will refer to the Home Office [guidance on criminal record checks for overseas applicants](#).

Some overseas qualified teachers can apply to the TRA for the award of qualified teacher status (QTS) in England. Woldingham, however, notes that holding a teaching qualification (wherever it was obtained) does not provide assurances that a candidate is suitable to work with children, or that they have not been found guilty of any wrongdoing or misconduct.

It is our practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by us 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.

It is our practice that a successful candidate will be required to subscribe to the DBS Update Service. Successful candidates must complete the School's DBS Update Service Consent Form to authorise the School to undertake status checks on an annual basis as part of the School's wider safeguarding due diligence].

Staff will be reimbursed for the cost of membership to the update service while employed.

Before using the Update Service, the School will:

- obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check;
- confirm the DBS certificate matches the individual's identity;
- examine the original certificate to ensure that it is valid for employment with the children's workforce, and;
- ensure that the level of the check is appropriate to the job for which they are applying e.g. enhanced DBS check/enhanced DBS check including barred list information.

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.

REFERENCES

The School will seek the references referred to in section 5 above for shortlisted candidates (including internal applicants) and will approach previous employers (five year work history or equivalent) 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 us to take up references in advance of the interview, they should notify us at the time of applying.

Woldingham School:

- does not accept open references e.g. to whom it may concern;
- does not rely on applicants to obtain their reference;
- ensures any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference is to be confirmed by the Head as accurate in respect of any disciplinary investigations);
- obtains verification of the individual's most recent relevant period of employment where the applicant is not currently employed;
- secures a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), and if the applicant has never worked with children, then ensures a reference from their current employer, training provider or educational setting;
- always verifies any information with the person who provided the reference;
- ensures electronic references originate from a legitimate source;
- contacts referees to clarify content where information is vague or insufficient information is provided;
- compares the information on the application form with that in the reference and will discuss any inconsistencies with the candidate;
- establishes the reason for the candidate leaving their current or most recent post, and
- ensures any concerns are resolved satisfactorily before appointment is confirmed.

The School will ask all referees if the candidate is suitable to work with children and to provide facts, not opinion, 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.

CRIMINAL RECORD CHECKS

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.

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>.

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 are not required to do so. A new, separate barred list check will be obtained.

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, the individual being subject to appropriate supervision);
- Safeguards reviewed at least every two weeks by the Head/Bursar 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 record and evidence kept of the measures put in place.

SINGLE CENTRAL RECORD (SCR)

The School maintains a Single Central Record in accordance with statutory requirements.

The SCR will record all required vetting and safeguarding checks carried out on:

- employees;
- supply staff provided by agencies;
- governors and trustees;
- contractors where required by statutory guidance;
- other individuals as required by regulatory obligations.

The School records, where applicable:

- identity checks;
- barred list checks;
- enhanced DBS certificate checks;
- prohibition from teaching checks;
- prohibition from management checks;
- right to work checks;
- overseas checks;
- qualifications checks;
- section 128 checks;
- childcare disqualification checks;
- dates on which checks were completed.

The SCR is regularly monitored to ensure compliance with statutory requirements and to provide assurance that appropriate safeguarding checks have been completed before individuals commence work where required.

RETENTION, SECURITY OF RECORDS AND DATA PROTECTION OBLIGATIONS

The School 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. The School do not keep full copies of DBS certificates, but a redacted version of the document which shows the certificate number. A copy of any update service check undertaken is filed, which details the date and time that this check was completed.

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

APPENDIX A - Policy on the Recruitment of Ex-Offenders

The School will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. The School makes 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. Any such matter will be reported to the Police and/or the DBS if the School:

- receives an application from a disqualified person;
- is provided with false information in, or in support of, an applicant's application; or
- has 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, 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;
- 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.

For inclusion in the policy, I would suggest slightly more balanced and defensible wording:
Where a role involves driving responsibilities, the School will give careful consideration to any driving-related convictions, endorsements, disqualifications or other motoring offences when assessing a candidate's suitability for the post. Such offences will normally be regarded as a significantly high risk factor in the recruitment decision, particularly where the role requires the regular transport of students, use of School vehicles, or driving as a substantial part of the individual's duties. Each case will be considered on its own merits, taking into account the nature, seriousness, recency and relevance of the offence, together with any evidence of rehabilitation and the requirements of the role.

APPENDIX B – FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS

