

## **King Edward VI High School for Girls and King Edward's School Recruitment, Selection and Disclosure Policy and Procedure**

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|-----------------------------|---------------------|
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## **1. Introduction**

King Edward VI High School for Girls (KEHS) and King Edward's School (KES) are committed to providing the best possible care and education to their pupils and to safeguarding and promoting the welfare of children and young people. The Schools are also committed to providing a supportive and flexible working environment to all members of staff. The Schools recognise that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.

The aims of the Schools' Recruitment, Selection and Disclosure 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
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education (KCSIE) (as per the updated version) the Prevent Duty Guidance for England and Wales 2023 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS)
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks

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

## **2. Recruitment and selection procedure**

All applicants for employment will be required to complete an application form containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. Should there be any gaps in academic or employment history, a satisfactory explanation must be provided. The applicant will also be required to provide details of any overseas employment of three months or more in the last five years. Curriculum vitae will not be accepted in place of the completed application form.

Applicants are required to sign a declaration at the end of the application form which confirms that all information given is true and complete, and that they are not on any barred lists or otherwise disqualified from working with children. It is also clearly stated that it is an offence to apply for the role if barred from engaging in regulated activity relating to children.

Applicants will receive a job description and person specification for the role applied for. Application forms, job descriptions, person specifications and the schools' Safeguarding and Child Protection policies are available to download from the Schools' websites and can be printed and forwarded to applicants on request.

All applications will be reviewed against the criteria specified in the job description and person specification, and candidates who meet the necessary criteria will be shortlisted to participate in a selection process. As required by KCSIE, online searches will be carried out for all shortlisted candidates, following the process outlined in the KES and KEHS Online Search Guidance.

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children, 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
- if they are known to the police and children's local authority social care
- if they have been disqualified from providing childcare
- information about criminal offences committed in any country in line with the laws as applicable in England and Wales, not the law in their country of origin or where they were convicted
- any relevant overseas information

Self-declaration is subject to KCSIE and Ministry of Justice guidance on the disclosure of criminal records.

Shortlisted candidates will then be invited to participate in a selection process, which will include a formal interview with a panel that includes at least one person who is Safer Recruitment trained. There may also be additional meetings and interviews, lesson observations and competency-based tasks, which will allow the candidate to demonstrate their relevant knowledge, skills and experience and discuss their suitability for the role in more detail.

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the Schools' standard terms and conditions of employment
- verification of the applicant's identity (where that has not previously been verified)
- the receipt of two references (one of which must be from the applicant's most recent employer) which the Schools consider to be satisfactory
- for positions which involve "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 (TRA) which renders them unable or unsuitable to work at the Schools
- where the position amounts to "regulated activity" (see section 4.3 below) the receipt of an enhanced disclosure from the DBS which the Schools consider to be satisfactory
- where the position amounts to "regulated activity" (see section 4.3 below) confirmation that the applicant is not named on the Children's Barred List\*
- 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 Schools

- for management positions, including the promotion of internal candidates to such 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 Schools
- confirmation that the applicant is not disqualified from working in connection with early or later years provision
- verification of the applicant's medical fitness for the role (see section 3 below)
- verification of the applicant's right to work in the UK
- 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 a letter from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed and sanctions or restrictions, and/or that they are aware of any reason why they may be unsuitable to teach
- verification of professional qualifications which the Schools deem a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified)

*\* The Schools are not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The Schools are required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, the Schools 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 Schools in order to decide which checks are appropriate. It is however likely that in nearly all cases the Schools will be able to carry out an enhanced DBS check and a Children's Barred List check.

Checks of the Children's Barred List will usually be completed as part of the enhanced DBS check process. The Schools will only carry out a separate Barred List check pending receipt of an enhanced DBS check for a newly appointed member of staff who will be engaging in regulated activity.

### **3. Medical fitness**

The Schools are legally required to verify the medical fitness of anyone to be appointed to a post at the Schools, after an offer of employment has been made but before the appointment can be confirmed.

It is the Schools' practice that all applicants to whom an offer of employment is made must complete a Health Questionnaire. This process is administered by the Schools' Occupational Health Service Provider, Medigold. If the occupational health advisor has any doubts about an applicant's fitness, the Schools will consider reasonable adjustments in consultation with the applicant, taking into account 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 timetable, extra-curricular activities, layout of the Schools etc. The Schools may also seek a further medical opinion from a specialist at Medigold, which may include a full medical assessment.

The Schools are aware of their 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.

#### **4. Pre-employment checks**

In accordance with the recommendations set out in KCSIE and the requirements of The Education (Independent School Standards) Regulations 2014, the Schools carry out a number of pre-employment checks in respect of all prospective employees.

In addition to the checks set out below, the Schools reserve 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 Schools. This includes internet and social media searches.

In fulfilling its obligations, the Schools do 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, disability or age.

##### **4.1 Verification of identity and address**

All applicants who are invited to an interview will be required to bring with them evidence of identity, right to work in the UK, address and qualifications 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
- original documents confirming any educational and professional qualifications required for the role as detailed the person specification.

Applicants will be asked to provide their birth certificate. 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.

The Schools ask for the date of birth of all applicants (and proof of this) in accordance with KCSIE. Proof of date of birth is necessary so that the Schools may verify the identity of, and check for any unexplained discrepancies in the employment and education history of all applicants. The Schools do not discriminate on the grounds of age.

## 4.2 References

References will normally be taken up on shortlisted candidates prior to interview. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

- One referee must be the applicant's **current** or **most recent employer**.
- References relating to work in a school must be supplied by the **Headteacher**.
- If the applicant has worked with children in the past, one reference must come from the school/setting where they were most recently employed to work with children.
- We reserve the right to take up references from any previous employer other than those supplied.
- We will ask referees for details including job title, dates of employment, key duties, suitability for the role, level/type of responsibility and details of any safeguarding concerns.
- Neither referee should be a relative or someone known to the applicant solely as a friend.
- Referees will be contacted to verify the reference.

All offers of employment, both teaching and non-teaching, will be subject to the receipt of a minimum of two references which are considered satisfactory by the Schools.

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. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism" (see the definition of "extremism" at section 7 below). 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, 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 false, unsubstantiated 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 or behaviour towards children or young people, except where the allegation or concerns were found to be false, unsubstantiated or malicious
- whether the applicant could be considered to be involved in "extremism" (*see the definition of "extremism" at section 7 below*)

The Schools 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 Schools 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 and the relevant referee before any appointment is confirmed.

### 4.3 Criminal records check

Prior to 29<sup>th</sup> 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 Schools.

Since 29<sup>th</sup> 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 DBS and the Home Office have developed a set of filtering rules relating to spent convictions which work as follows:

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

An adult conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if all of the conditions below apply:

- eleven years have elapsed since the date of conviction
- it is the person's only offence
- it did not result in a custodial sentence

It will not be removed under any circumstances if it appears on a list of "specified offences" which must always be disclosed. If a person has more than one offence on their criminal record, then details of all their convictions will always be included.

A caution received when a person was aged 18 or over for an offence committed in the United Kingdom will not be disclosed if six years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

***For those aged under 18 at the time of an offence:***

A conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if all of the conditions below apply:

- five and a half years have elapsed since the date of conviction
- it is the person's only offence
- it did not result in a custodial sentence

Again, the conviction will not be removed under any circumstances if it appears on the list of "specified offences", or if a person has more than one offence on their criminal record.

A caution received when a person was aged under 18 for an offence committed in the United Kingdom will not be disclosed if two years have elapsed since the date it was issued and if it does not appear on the list of "specified offences".



***The list of "specified offences" which must always be disclosed:***

This contains a large number of offences, which includes certain sexual, violent and other offences that are considered so serious they will always be disclosed, regardless of when they took place or of the person's previous or subsequent criminal record. 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 Schools apply 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 Schools 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 will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

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

The DBS now issues a DBS disclosure certificate to the subject of the check only, rather than to the Schools. It is a condition of employment with the Schools that the original disclosure certificate is provided to the School within two weeks of it being received by the applicant. Original certificates should not be sent by post. Applicants must bring the original certificate into the Schools within two weeks of it being received. A convenient time and date for doing so should be arranged with the HR team as soon as the certificate has been received. Applicants who are unable to visit the Schools to provide the certificate are required to send in a certified copy by post or email within two weeks of the original disclosure certificate being received. Certified copies must be sent to the HR team. 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 Schools.

If there is a delay in receiving a DBS disclosure the Chief Master & Principal 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.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants may also be asked to provide further information, including a criminal records check from the relevant jurisdiction(s), a certificate of good conduct and/or references from any employment held. Work can only commence once the overseas information has been received and only if the Schools have considered that information and confirmed that the applicant is suitable to commence work at the Schools.

#### **4.4 Prohibition from teaching check**

The Schools are required to check whether staff who carry out "teaching work" are prohibited from doing so. The Schools use the TRA 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 TRA.

In addition, the Schools ask all applicants for roles which involve "teaching work" (and their referees) to declare in the application form whether they have ever been referred to, or are the subject of a sanction, restriction or prohibition issued by, the TRA or other equivalent body in the UK.

It is the Schools' position that this information must be provided in order to fully assess the suitability of an applicant for a role which involves "teaching work". Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the TRA (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 Schools will consider whether the facts of the case render the applicant unsuitable to work at the Schools.

The Schools carry out this check, and require associated information, for roles which involve "teaching work". In doing so the Schools apply 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
- 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 Chief Master & Principal. 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.

Where an applicant has carried out teaching work outside of the UK, the Schools may carry out any further checks deemed necessary, for example an overseas criminal records check or obtaining a letter from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed sanctions or restrictions, and that they are aware of any reason why they may be unsuitable to teach.

#### **4.5 Prohibition from management check**

The Schools are required to check whether any applicant for a management position, including internal candidates, 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).

This check applies to appointments to the following positions made on or after 12<sup>th</sup> August 2015:

- Chief Master & Principal
- teaching and support staff posts on the senior leadership teams

It also applies to appointments of governors and trustees.

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

In addition, the Schools ask all applicants for management roles to declare in the application form 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.

It is the Schools' position that in order to fully assess the suitability of an applicant for a management role it must be provided with the above information. 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 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 Schools will consider whether the facts of the case render the applicant unsuitable to work at the Schools.

#### **5. Contractors and agency staff**

Contractors engaged by the Schools must complete the same checks for their employees that the Schools are required to complete for their staff. The Schools require confirmation that these checks have been completed before employees of the Contractor can commence work at the Schools.

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

The Schools will independently verify the identity of staff supplied by contractors or an agency in accordance with section 2 and will require the provision of the a letter of assurance before contractor or agency staff can commence work at the Schools.

## **6. Volunteers**

The Schools 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 Schools (the definition of regulated activity set out in section 4.3 above will be applied to all volunteers).

The Schools will request an enhanced DBS disclosure without Children's Barred List information on all volunteers who do not undertake regulated activity. This is likely to be because their volunteering duties are subject to regular, day to day supervision by a fully checked member of staff or by a volunteer who the Schools have deemed appropriate to supervise and ensure the safety of those pupils in their care.

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

It is the Schools' 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 Schools for three consecutive months or more. Those volunteers who are likely to be involved in activities with the Schools on a regular basis may be required to sign up to the DBS update service as this permits the Schools to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition, the Schools 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):

- internet and social media checks
- 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
- an informal safer recruitment interview

## **7. Visiting speakers and the Prevent Duty**

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

The Schools are 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 Schools or perform any other regular duties for or on behalf of the Schools.

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

The Schools 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 Schools. In doing so the School will always have regard to 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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations."*

In fulfilling its Prevent Duty obligations the Schools do 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, disability or age.

The Schools reserve the right to obtain such information on any other person appointed to work for or at the Schools.

## **8. Policy on recruitment of ex-offenders**

### **8.1 Background**

The Schools will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. The Schools make 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 Schools. Each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph 8.2 below.

All positions within the Schools are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules (see section 4.3 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 Schools 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 Schools. The School will make a report to the Police and/or the DBS in the following circumstances:

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

### **8.2 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
- the circumstances surrounding the offence and the explanation(s) offered by the applicant

If the post involves regular contact with children, it is the Schools' 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 the Schools' 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 Schools' normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

### **8.3 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 Schools will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Principal before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the Schools 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.

### **8.4 Retention and security of disclosure information**

The Schools' policy is to observe the guidance issued or supported by the DBS on the use of disclosure information. In particular, the Schools will:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of the HR Department and Schools' senior management team
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months. The Schools will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken

- ensure that any disclosure information is destroyed by suitably secure means such as shredding
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates

## **9. Retention of records**

The Schools are legally required to undertake the above pre-appointment checks. Therefore, if an applicant is successful in their application, the Schools will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help the Schools to discharge its obligations as an employer e.g. so that the Schools may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by the Schools for the duration of the successful applicant's employment with the Schools. If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months. The same policy applies to any suitability information obtained about volunteers involved with School activities.

## **10. Referrals to the DBS and Teaching Regulation Authority (TRA)**

This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks the School also has a legal duty to make a referral to the DBS in circumstances where an individual:

- has applied for a position at the Schools despite being barred from working with children; or
- has been removed by the Schools 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

If the individual referred to the DBS is a teacher, the Schools may also make a referral to the TRA.

## **11. Queries**

If an applicant has any queries on how to complete the application form or any other matter he/she should contact the HR team who will either advise the applicant or refer the matter to another senior colleague.

## **12. Review of the policy**

This policy has been prepared by the HR Director based on a VWV template and has been adopted for all recruitment activity commencing after 15<sup>th</sup> January 2016.

The policy will be reviewed and revised based on professional advice by the Schools' HR Manager and the Bursar - Finance and Estates and will be reviewed by the Governors at the Risk and Compliance Committee subsequently by the Independent Schools' Governing Body as part of an annual cycle of review.

## **Appendix 1 List of valid identity documents**

The documents needed will depend on the route the application takes. The applicant must try to provide documents from Route 1 first.

### **Route 1**

The applicant must be able to show:

- One document from Group 1
- Two further documents from either Group 1, or Group 2a or 2b
- At least one of the documents must show the applicant's current address

### **Route 2**

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

- One document from Group 2a
- Two further documents from either Group 2a or 2b
- At least one of the documents must show the applicant's current address. The School must then also use an appropriate external ID validation service to check the application.

### **Route 3**

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

- A birth certificate issued after the time of birth (UK and Channel Islands)
- One document from Group 2a
- Three further documents from Group 2a or 2b

At least one of the documents must show the applicant's current address. If the applicant can't provide these documents, they may need to be fingerprinted.



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**Group 1: Primary identity documents**

| Document                                                  | Notes                                                                                                                                          |
|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| Passport                                                  | Any current and valid passport                                                                                                                 |
| Biometric residence permit                                | UK                                                                                                                                             |
| Document                                                  | Notes                                                                                                                                          |
| Current driving licence photocard - (full or provisional) | UK, Isle of Man, Channel Islands and EU                                                                                                        |
| Birth certificate - issued within 12 months of birth      | UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, for example embassies, High Commissions and HM Forces |
| Adoption certificate                                      | UK and Channel Islands                                                                                                                         |

**Group 2a: Trusted government documents**

| Document                                                                              | Notes                                                                    |
|---------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| Current driving licence photocard - (full or provisional)                             | All countries outside the EU (excluding Isle of Man and Channel Islands) |
| Current driving licence (full or provisional) - paper version (if issued before 1998) | UK, Isle of Man, Channel Islands and EU                                  |
| Birth certificate - issued after time of birth                                        | UK, Isle of Man and Channel Islands                                      |
| Marriage/civil partnership certificate                                                | UK and Channel Islands                                                   |
| HM Forces ID card                                                                     | UK                                                                       |
| Firearms licence                                                                      | UK, Channel Islands and Isle of Man                                      |
| All driving licences must be valid.                                                   |                                                                          |

**Group 2b: Financial and social history documents**

| <b>Document</b>                                              | <b>Notes</b>                                                                                         | <b>Issue date and validity</b> |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------|--------------------------------|
| Mortgage statement                                           | UK or EEA                                                                                            | Issued in last 12 months       |
| Bank or building society statement                           | UK and Channel Islands or EEA                                                                        | Issued in last three months    |
| Bank or building society account opening confirmation letter | UK                                                                                                   | Issued in last three months    |
| Credit card statement                                        | UK or EEA                                                                                            | Issued in last three months    |
| Financial statement, for example pension or endowment        | UK                                                                                                   | Issued in last 12 months       |
| P45 or P60 statement                                         | UK and Channel Islands                                                                               | Issued in last 12 months       |
| Council Tax statement                                        | UK and Channel Islands                                                                               | Issued in last 12 months       |
| Work permit or visa                                          | UK                                                                                                   | Valid up to expiry date        |
| Letter of sponsorship from future employment provider        | Non-UK or non-EEA only - valid only for applicants residing outside of the UK at time of application | Must still be valid            |
| Utility bill                                                 | UK - not mobile telephone bill                                                                       | Issued in last three months    |

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|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| Benefit statement, for example Child Benefit, Pension                                                                                                                             | UK                                                                                                                                | Issued in last three months |
| Central or local government, government agency, or local council document giving entitlement, for example from the Department for Work and Pensions, the Employment Service, HMRC | UK and Channel Islands                                                                                                            | Issued in last three months |
| EU National ID card                                                                                                                                                               | -                                                                                                                                 | Must still be valid         |
| Cards carrying the PASS accreditation logo                                                                                                                                        | UK, Isle of Man and Channel Islands                                                                                               | Must still be valid         |
| Letter from head teacher or college principal                                                                                                                                     | UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be provided | Must still be valid         |