



LIFE SCHOOL SAFER RECRUITMENT POLICY

This policy, which applies to the whole school, 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 school.

Document Details

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Date	Amendment

Availability: This policy applies to all activities undertaken by the school, inclusive of those outside of the normal school hours and away from the school site and is inclusive of all staff (teaching, support and agency staff), pupils on placement, contractors, the Chief Executive Officer, the Advisory Board and volunteers working in the school. All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy being required to state that they have read, understood and will abide by this policy and its procedural documents and confirm this by signing the *Policies Register*.

Monitoring and review:

- This document will be subject to continuous monitoring, refinement and audit by the Headteacher
- This policy was last reviewed agreed by the Advisory Board in January 2021 and will next be reviewed no later than January 2022 or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Signed:

Sarah Quilty
Headteacher

Alastair Saverimutto
Chief Executive Officer

LIFE SCHOOL is committed to safeguarding and promoting the welfare of pupils and expects all staff and volunteers to share this commitment. It is our aim that all pupils fulfil their potential.

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Introduction: The school is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff. The School recognises 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 School's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, 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* (September 2020) (KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the **Prevent Duty Guidance**) and any guidance or code of practice published by the Disclosure and Barring Service (DBS);
- to comply with Part 4 of the Education (Independent School Standards) (England) (Amendment) Regulations, (currently in force) with reference to the appointment of the Proprietor (Chief Executive Officer), all staff, external providers and volunteers inclusive of completion of the Single Central Record (otherwise referred to as the Centralised Register) and
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

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

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. A curriculum vitae will not be accepted in place of the completed application form.

Applicants will receive a job description and person specification for the role applied for. When there is a vacancy application forms, job descriptions and person specifications are available to download from the School's website and can be printed and forwarded to applicants on request. The safeguarding child protection policy is on the School website.

The applicant may then be invited to attend a **formal interview** at which his / her relevant skills and experience will be discussed in more detail. To safeguard children the interview panel should explore:

- *the candidate's attitude toward children:* being assessed through their personal statement and through questions that probe their values, beliefs and ethics;
- *the candidate's motivation to work with children:* with 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;

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- *their ability to form relationships and retain personal boundaries*: with this being 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*: with questions asking them to draw on previously difficult situations and how they managed these will help you assess this;
- *their ability to support the authority/establishment's agenda for safeguarding and promoting the welfare of children*: seeking clarification on their understanding of the Schools' Organisations/County'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 must be discussed and clarified;
- concerns or discrepancies arising from the information provided by the candidate or referee;
- if for any reason references have not been provided before the interview the candidate should 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.

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 School's 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 School considers 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 TRA (formerly NCTL) which renders them unable or unsuitable to work at the School;
- for applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at the School;
- where the position amounts to "regulated activity" (see section 0 below) the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory;
- where the position amounts to "regulated activity" (see section 0 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 School;
- for management positions, information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at the School;
- confirmation that the applicant is not disqualified from working about early or later years provision (if applicable, see section 0 below);
- verification of the applicant's medical fitness for the role (see section 0 below);
- verification of the applicant's right to work in the UK;
- any further checks which the School decides are necessary because of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references; and
- verification of professional qualifications which the School deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).
- The Teachers Services' system will be used to verify any award of qualified teacher status (QTS) and the completion of teacher induction or probation.

The School is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The School is required to carry out an enhanced DBS check for all staff, supply staff and the Chief Executive Officer, who will be

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

Medical fitness: The School is legally required to verify the medical fitness of anyone to be appointed to a post at the School, **after** an offer of employment has been made but **before** the appointment can be confirmed. It is the School's practice that all applicants to whom an offer of employment is made must complete a Health Questionnaire. The School will arrange for the information contained in the Health Questionnaire to be reviewed by the School's medical advisor. This information will be reviewed against the Job Description and the Person Specification for the role, together with details of any other physical or mental requirements of the role i.e. proposed timetable, extra-curricular activities, layout of the School etc. If the School's medical advisor has any doubts about an applicant's fitness the School will consider reasonable adjustments in consultation with the applicant. The School may also seek a further medical opinion from a specialist or request that the applicant undertakes a full medical assessment.

Successful applicants will be required to sign a declaration of medical fitness confirming that there are no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the role. If an applicant prefers to discuss this with the School instead, or to attend an occupational health assessment to consider their fitness for the role, they should contact the Business Administrator so that appropriate arrangements can be made.

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

Pre-employment checks: In accordance with the recommendations set out in KCSIE, DUCA and the requirements of the Education (Independent School Standards) Regulations 2014, the School carries out several pre-employment checks in respect of all prospective employees, including an enhanced DBS with barred-list check. In addition to the checks set out below, the School reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. This may include internet and social media searches. The school will always ask for written information about previous employment history and check that information is not contradictory or incomplete. In fulfilling its obligations, the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

Vetting checks (COVID-19): Vetting requirements have not changed during the pandemic and remain an extremely important step to ensure that unsuitable people are not allowed to access pupils. However, we recognise the practical difficulties in which applicants may have when providing hard copies of employment or identification details.

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 0 (these requirements comply with DBS identity checking guidelines):

- one document from Group 1;
- 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 referred to in their application form.

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

References: References will be taken up on short listed 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.

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the School. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend. References will always try to be obtained in writing. Where electronic references are received, the school will ensure they originate from a legitimate source.

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 0 below). All referees will be sent a copy of the job description and person specification for the role for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title / duties, reason for leaving, performance, sickness* and disciplinary record;
 - whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be 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 involved in "extremism" (see the definition of "extremism" at section 0 below).
- (*questions about health or sickness records will only be included in reference requests sent out after the offer of employment has been made.)

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials. The School will compare all references with any information given on the application form. References will be scrutinised and any concerns, discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed. The School may at its discretion make telephone contact with any referee to verify the details of the written reference provided and ask for further clarification as appropriate, for example if the answers are vague or if insufficient. Any information about past disciplinary action or allegations that are disclosed will be considered carefully when assessing the applicant's suitability for the post (including information obtained from the Teacher Services' checks referred to previously). Further help and advice can be found on the Advisory, Conciliation and Arbitration Service (ACAS) website.

In providing references for our own staff, if there was a safeguarding case in which an allegation against the member of staff was proven to be false, unsubstantiated or malicious, this would not be included in employer references.

Criminal records check: Prior to 29 May 2013 an enhanced disclosure contained details of all convictions on record (including those which are defined as "spent" under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. It could also contain non-conviction information from local police records which a chief police officer considered relevant to the role applied for at the School. Since 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The 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:

- eleven years have elapsed since the date of conviction;
- it is the person's only offence; and

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- 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:

- five and a half years have elapsed since the date of conviction; it is the person's only offence and
- 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 many 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 School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the School which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. It can also indicate if an applicant or member of staff has behaved or may have behaved in a way that indicates they may not be suitable to work with children. Any position undertaken at, or on behalf of the School will amount to "regulated activity" if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the "period condition", meaning four times or more in a 30-day period; or
- provides personal care, or health care (including helping a child eat, drink, washing, dressing)
- 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 School to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances. However, nearly all posts at the School amount to regulated activity. Limited exceptions could include an administrative post undertaken on a temporary basis in the School office outside of term time 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 School. It is a condition of employment with the School that the **original** disclosure certificate is provided to the School within 5 days of it being received by the applicant. Original certificates should not be sent by post and should be brought into School by the Applicant. A convenient time and date for doing so should be arranged with [• details] as soon as the certificate has been received. Applicants who are unable to attend at the School to provide the certificate are required to send in a certified copy, signed by a solicitor, by post or email within five days of the original disclosure certificate being received, being sent to: Chief Executive Officer. Where a certified copy is sent, the original disclosure certificate must still be provided prior to the first day of work. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School.

If there is a delay in receiving a DBS disclosure the Headteacher 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

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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 record 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 School has considered that information and confirmed that the applicant is suitable to commence work at the School.

Prohibition from teaching check: The School is required to check whether staff who carry out "teaching work" are prohibited from doing so. The School uses the Teacher Regulation Agency (TRA) 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 School asks 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. If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual who works at the school, immediate action will be taken to ensure the individual does not carry out work in contravention of the order, i.e pending the findings of the TRA investigation, the individual must not carry out teaching work. We would not employ, not allow an existing member of staff to continue working with children including teaching work should a teaching prohibition order, or an interim prohibition order be issued.

It is the School's position that this information must be provided 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 School will consider whether the facts of the case render the applicant unsuitable to work at the School.

The School carries out this check, and requires associated information, for roles which involve "teaching work". In doing so the School applies the definition of "teaching work" set out in the Teachers' Disciplinary (England) Regulations 2012 which states that the following activities amount to "teaching work":

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

The above activities do not amount to "teaching work" if they are supervised by a qualified teacher or other person nominated by the Headteacher. 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. In addition, for all appointments made on or after 18 January 2016, where an applicant has carried out teaching work outside of the UK the School will ask the applicant (and their referees) whether they have ever been referred to, or are the subject of a sanction issued by, a regulator of the teaching profession in the countries in which they have carried out teaching work. This will include checking for the existence of any sanctions issued by regulators of the teaching profession in other countries using the Criminal Record Checks for Overseas Applicants procedures via Gov.uk alongside with obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked (details of which can be accessed via the National Recognition Information Centre for the UK (UK NARIC). Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, (UK NARIC).

Prohibition from management check: The School is required to check whether any applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent School (a **section 128 direction**). This check will be made via the Teaching Regulation Agency (TRA). This check applies to appointments to the following positions made on or after 12 August 2015:

- Chief Executive Officer
- Headteacher;

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- teaching posts on the senior leadership team;
- teaching posts which carry a departmental role;
- support staff posts on the senior leadership and
- a Member of the Advisory Board, that retains or has been delegated any management responsibilities.

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

In addition, the School asks 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 School's 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 School will consider whether the facts of the case render the applicant unsuitable to work at the School.

Applicants are not required to disclose a caution or conviction for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules (see section 0 above). Applicants must not ask for information about spent convictions from any member of their household. For the avoidance of doubt the School does not require applicants to request any criminal records information directly from the DBS. The School only requires applicants to provide relevant information about themselves and members of their household "to the best of their knowledge".

A person who discloses information which appears to disqualify them from working in a relevant role may apply to Ofsted for a waiver of the disqualification. The School may withdraw an offer of employment at its absolute discretion and is under no obligation to await the outcome of an Ofsted waiver application. If a waiver application is rejected the School will withdraw the conditional offer of employment. The School will securely destroy any information which is provided by an applicant which is not relevant to the childcare disqualification requirements as soon as it is established that it is not relevant. Where a person appointed to a role at the School is found to be disqualified, the School will retain any relevant information only for the period it takes for a waiver application to be heard and the decision communicated to the School, after which it will be securely destroyed.

After making this declaration staff in a relevant role are under an on-going duty to inform the School if their circumstances change in a way which would mean they subsequently meet any of the criteria for disqualification. Any failure to disclose relevant information now, or of a future change in circumstances, will be treated as a serious disciplinary matter and may lead to the withdrawal of a job offer or dismissal for gross misconduct.

Contractors and agency staff: Contractors engaged by the School must complete the same checks for their employees that the School is required to complete for its staff. The School requires written confirmation that these checks have been completed before employees of the Contractor can commence work at the School. Agencies who supply staff to the School must also complete the pre-employment checks which the School would otherwise complete for its staff. Again, the School requires written confirmation that these checks have been completed before an individual can commence work at the School. The School will independently verify the identity of staff supplied by contractors or an agency in accordance with section 0 above and will require the provision of the original DBS disclosure certificate before contractor or agency staff can commence work at the School. **The school will obtain a DBS check on behalf of any contractors who are self-employed prior to their work commencing at the school.**

Trainee/pupil teachers: Where applicants for initial teacher training are salaried by the school, we will ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including barred list information) will also be obtained.

Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. The School will obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children.

Existing staff: If the school has concerns about an existing staff member's suitability to work with children, the school will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the school moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity must be carried out. The school has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and the individual has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left.

Volunteers: The School will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of the School (the definition of regulated activity set out in section 0 above will be applied to all volunteers). The School will request an enhanced DBS disclosure without Children's Barred List information on all volunteers who do not undertake regulated activity. 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 School has deemed appropriate to supervise and ensure the safety of those pupils in their care. Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils. It is the School's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the School for three consecutive months or more.

Those volunteers who are likely to be involved in activities with the School on a regular basis may be required to sign up to the DBS update service as this permits the School to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates. In addition, the School will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):

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

Visiting speakers and the Prevent Duty: The Prevent Duty Guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised. The School is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the School or perform any other regular duties for or on behalf of the School.

All visiting speakers will be subject to the School's usual visitor's protocol, inclusive of our Visitors and Security Policy. This will include signing in and out, the wearing of a visitor's badge at all times and being escorted by a fully vetted member of staff between appointments. The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and / or permit a speaker to attend the School. In doing so the School will always have regard to the Visitors and Security Policy, 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 School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age. The School reserves the right to obtain such information on any other person appointed to work for or at the School.

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Adults who supervise children on work experience: Where the school organises work experience placements for its pupils, or should pupils organise their own work experience placements through the school, we will ensure that the placement provider has policies and procedures in place to protect children from harm, this includes Barred list checks by the DBS on some people who supervise a child under the age of 16 on a work experience placement. The school will consider the specific circumstances of the work experience. Consideration will be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations would include whether the person providing the teaching/training/instruction/supervision to the pupil on work experience will be:

- unsupervised themselves; and
- providing the teaching/training/instruction frequently (more than three days in a 30 day period, or overnight).

If the person working with the pupil is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. If so, the school will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person. The school is unable to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience. If the activity undertaken by the child on work experience takes place in a 'specified place', such as a school or college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity. In these cases and where the child is 16 years of age or over, the work experience provider will consider whether a DBS enhanced check should be requested for the child/young person in question. DBS checks cannot be requested for children/young people under the age of 16.

Policy on recruitment of ex-offenders

Background: The School will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. The School makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the School. Each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph 0 below. All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974.

All applicants must therefore declare all previous convictions 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 0 above). A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence. It is unlawful for the School to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the School. The School will make a report to the Police and / or the DBS if:

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

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

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

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

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

If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud. If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years or other serious motoring offences considered inappropriate by the School.

Assessment procedure: In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by Headteacher of the School 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 School may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Retention and security of disclosure information: The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information. In particular, the School 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 School's senior management team;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months. The School 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; and
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

Retention of records: The School is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the School 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 School to discharge its obligations as an employer e.g. so that the School 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 School for the duration of the successful applicant's employment with the School. It will be retained in accordance with the School's retention of records policy after employment terminates. 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.

Whistleblowing and exit interviews: All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the School's policies (including the whistleblowing policy, the safeguarding policy and the Staff code of conduct). Safeguarding children is at the centre of the School's culture and is accordingly considered formally during staff performance development reviews and appraisal and finally at an exit interview which are held with all leavers.

Referrals to the DBS and Teaching Regulation Agency (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 refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence;
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left because they have harmed, or pose a risk of harm to, a child and
- the individual has applied for a position at the school despite being barred from working with children.

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

Queries: If an applicant has any queries on how to complete the application form or any other matter he / she should contact the Headteacher.

Appendix 1 – Single Central Record (SCR)

The school maintains an electronic single central record of pre-appointment checks, referred to in the Regulations as the register. Our single central record covers all staff, including teacher trainees on salaried routes, supply staff (see KCSIE paragraph 152) who work at the school and the Chief Executive Officer. The bullet points below set out the minimum information that is recorded in respect of staff members (including teacher trainees on salaried routes). The record indicates whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check, a barred list check, an enhanced DBS check/certificate, a prohibition from teaching check;
- a section 128 check (for management positions for independent schools);
- further checks on people who have lived or worked outside the UK;
- a check of professional qualifications, where required and a check to establish the person's right to work in the United Kingdom.

In addition, we record whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18. For supply staff, or third party, we also include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.

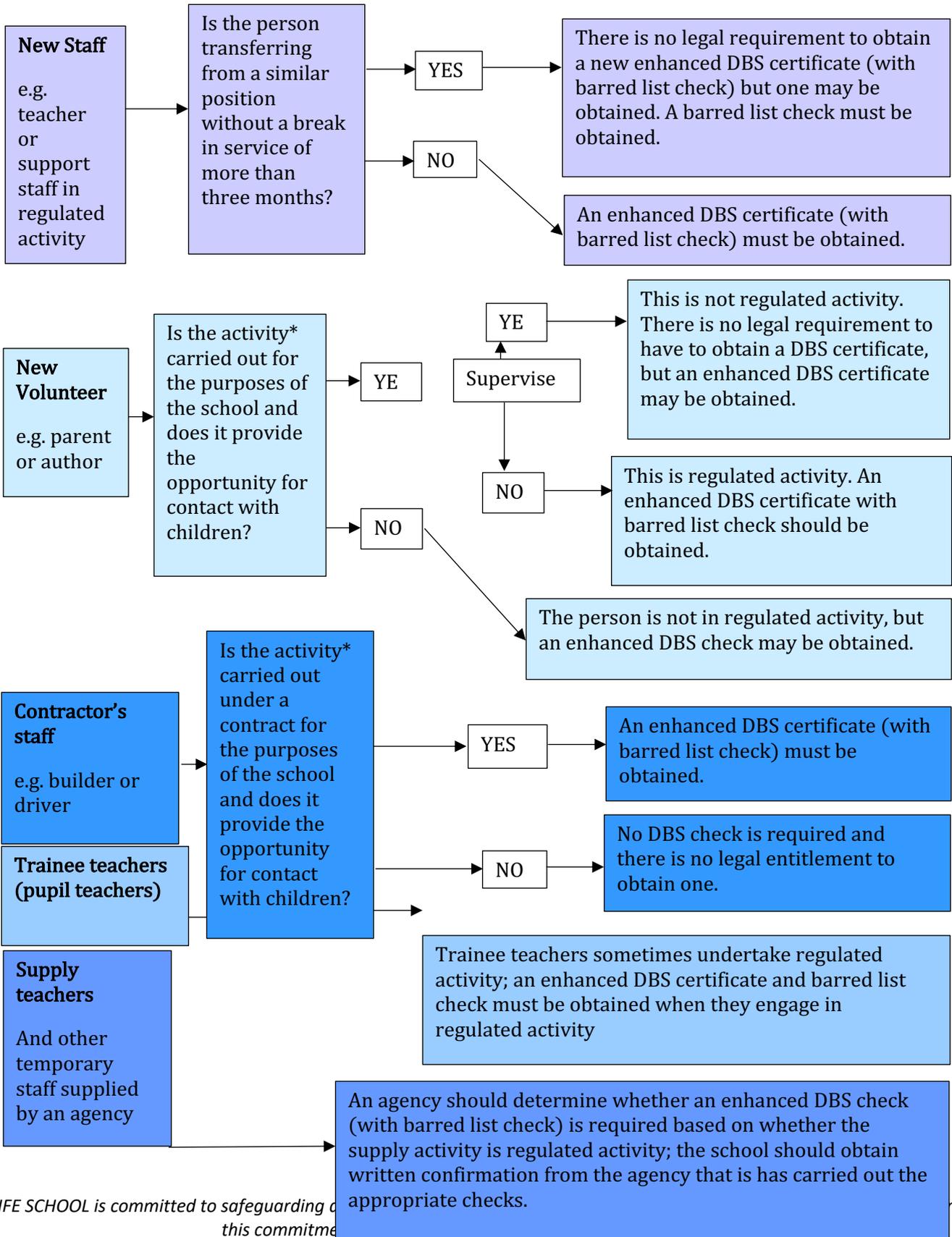
Whilst there is no statutory duty to include on the single central record details of any other checks, we also record other relevant information. For example, checks for childcare disqualification, volunteers, and safeguarding and safer recruitment training dates. We also record the name of the person who carried out each check. Although we do not need to retain copies of DBS certificates in order to fulfil our duty of maintaining the single central record, we may choose to hold copies of these, but this will be for no longer than six months. Any copies of other documents used to verify a successful candidate's identity, right to work and required qualifications will be kept in their personnel file. Individuals who have lived or worked outside the UK will undergo the same checks as all other staff in the schools. In addition, the school will make any further checks we feel appropriate so that any relevant events that occurred outside the UK can be considered.

	ISI notes	Staff	Supply	Proprietors – members of a body
Name	Note 3	Yes	Yes	Yes
Post to which appointed	Note 3	Yes	Yes	Yes
Date on which appointment started	Note 3	Yes	Yes	Yes
Date on which identity was checked by school	Note 1	Yes	No – Note 4	Yes
Date of receipt of confirmation that identity was checked by supply agency	Note 1	No	Yes - Note 5	No
Date on which qualifications were checked (or N/A if not applicable)	Note 1	Yes, if applicable	Yes, if applicable – Note 5	No
Date on which enhanced DBS certificate was checked by school	Note 1	Yes	Yes – Note 6	Yes
Date of receipt of confirmation that enhanced DBS was checked by supply agency	Note 1	No	Yes – Note 5	No
Date on which barred list was checked	Note 1	Yes	Yes – Note 5	Yes, if required – Note 7
Date on which right to work in UK was checked	Note 1	Yes	Yes – Note 5	Yes, if applicable
Date on which overseas checks were received (or N/A if not applicable)	Note 1	Yes, if applicable	Yes, if applicable – Note 5	Yes, if applicable
Date on which prohibition from teaching was checked (or N/A if not applicable)	Note 1	Yes, if applicable	Yes, if applicable – Note 5	Yes, if required – Note 7
Date on which prohibition from management was checked (or N/A if not applicable)	Note 1	Yes, if applicable	Yes, if applicable – Note 5	Yes – Note 7
Date on which references were checked	Note 2	Yes	Yes – Note 5	No
Date on which employment history was checked	Note 2	Yes	Yes – Note 5	No
Date on which medical fitness was checked	Note 2	Yes	Yes – Note 5	No
Date on which disqualification from childcare was checked	Note 2	Yes, if applicable	Yes, if applicable – Note 5	Yes, if required

Yes = a check which should be undertaken. **No** = a check which is not required for this particular category.

- Note 1: The standards require the SCR to record the dates on which these checks have been carried out.
- Note 2: Neither the standards nor KCSIE require these dates to be recorded on the SCR but are clear that these checks must be carried out (or 'should' be in the case of references and employment history). As inspectors and senior managers need to check that all necessary pre-employment checks have been carried out before a member of staff starts work at the school, it is sensible to record the dates of these checks on the SCR.
- Note 3: This information is not required to be recorded on the SCR, but the document becomes unworkable if it is not included.
- Note 4: We are required to check the identity of supply staff on arrival. It is helpful but not a requirement to include the date of this check on the SCR.
- Note 5: This should be the date on which the school has received written notification from the supply agency confirming that the agency has carried out this specific check for this specific person.
- Note 6: This should be the date on which the school has seen the member of staff's DBS certificate
- Note 7: These checks need only be done where required (eg if the particular proprietor will be in regulated activity or will teach), but are not required on the SCR. As above, inspectors and senior managers need to check that all necessary pre-employment checks have been carried out before a person commences their role, so it is sensible to record the dates of these checks on the SCR. NB1: Where a school records information for the SCR within its Information Management System (IMS), the IMS must be capable of producing a simple printout which contains the above information

APPENDIX 2: FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS



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

The ability to ask questions that probe deeper and get beneath superficial answers is a skill that takes time to develop and practice. Those who wish to deceive are practiced in the art of deception. They may rehearse model answers to questions about safeguarding or areas of their past and it is essential that the asked unpick these responses so that there can be confidence in the validity of the answers. In an interview for a school-based post you should always ask questions about safeguarding, regardless of the role's level of contact with children. All school staff and volunteers will have a responsibility for the protection of children.

You will need to ask safeguarding questions aimed at assessing the candidate's attitude toward safeguarding children. This should be the same questions for all candidates and should be **open** to gather up as much information as possible. You should then **probe** the candidate's response to investigate the validity of the answer – clarifying ambiguities, expanding upon any issues, or challenging any areas – your probes are likely to be different for each candidate depending on their responses.

Closed questions should be used sparingly but can be useful if you just want to clarify or confirm something that the candidate is saying. Hypothetical questions can be useful if the candidate cannot draw on real life experience, but they are likely to elicit a **hypothetical** answer, which is not necessarily what the candidate would do in that actual situation.

Past behaviour is often the best indicator of future performance! Be aware that the child protection cases should be handled confidentially and sensitively. You do not need to ask the candidate for the exact details of a case you might be talking about – you are trying to assess their attitude, motivations and actions, so you can ask about what they did in that situation and how they handled it. Below are examples of questions designed to examine a candidate's attitude towards safeguarding children, and some positive (the kind of things you hope they would say) and negative (things that might ring alarm bells) indicators.

Appendix 3: List of valid identity documents

Group 1: primary identity documents

- current valid passport
- biometric residence permit (UK)
- current driving licence (photocard with paper counterpart; full or provisional; UK / Isle of Man / Channel Islands and EU)
- birth certificate (UK & Channel Islands; issued at the time of birth (within 42 days of date of birth); full or short form acceptable including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces)
- adoption certificate (UK and Channel Islands)

Group 2a: trusted government documents

- current driving licence (paper version; UK / Isle of Man / Channel Islands and EU; full or provisional)
- current driving licence (photocard; all countries; full or provisional)
- current non-UK driving licence (valid for up to 12 months from the date the applicant entered the UK)
- birth certificate (UK and Channel Islands; issued at any time after the date of birth by the General Registrar Office / relevant authority i.e. Registrars)
- marriage / civil partnership certificate (UK and Channel Islands)
- HM Forces ID card (UK)
- firearms licence (UK, Channel Islands and Isle of Man)

Group 2b: Financial and social history documents

- mortgage statement **
- bank / building society statement *
- bank / building society account opening confirmation letter (UK)*
- credit card statement *
- financial statement - e.g. pension, endowment, ISA **
- P45 / P60 statement **(UK and Channel Islands)
- council tax statement (UK and Channel Islands) **
- work permit / visa (UK; valid up to expiry date)
- letter of sponsorship from future employment provider (non-UK only; valid only for applicants residing outside the UK at the time of application; must be valid at time of application)
- utility bill (UK; not mobile telephone bill) *
- benefit statement - e.g. child benefit, pension (UK)*
- a document from central or local government/ government agency / local authority giving an entitlement - e.g. from the Department for Work and Pensions, the Employment Service, HM Revenue & Customs, Job Centre, Job Centre Plus, Social Security (UK and Channel Islands) *
- EU national ID card (must be valid at time of application)
- cards carrying the PASS accreditation logo (UK and Channel Islands; must be valid at time of applications)
- letter from Headteacher (for 16-19-year olds in full time education. This is only used in exceptional circumstances if other documents cannot be provided; must be valid at time of application).

Note: If a document in the list of valid identity documents is:

denoted with * - it should be less than three months old

denoted with ** - it should be less than 12 months old

APPENDIX 4 : REGULATED ACTIVITY

Regulated activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government has produced a [Factual note on regulated activity in relation to children: scope.](#)

Regulated activity includes:

- a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly.⁴⁴ Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
 - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;⁴⁵
 - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.