St Paul's CE (VC) First School

Coven

Safer Recruitment Policy

At St Paul's, our welcoming Christian community, accepts and enables all to flourish to achieve their God-given potential. We develop independent and resilient learners, who lovingly respect each other with care and kindness. All are invited to make a difference in the world in which they live following in the footsteps and teachings of Jesus Christ.

"Love your neighbour as yourself." - Luke 10:27

St Paul's First School, Coven

Safer Recruitment Policy

Comments:	Annual Review
Signed:	4th October 2022
Review:	22nd May 2024
Review:	12th November 2025
Review:	24th June 2026

1.0 Introduction

1.1 St. Paul's First School is committed to providing the highest level of education and care to its pupils and to safeguarding and promoting the welfare of children and young people.

1.2 St. Paul's First School recognises that the safe recruitment of its staff in school is essential to safeguard the children in attendance.

1.3 Safer practice in recruitment means thinking about and including issues relating to child protection and safeguarding and promoting the welfare of children at every stage of the process and for all people being recruited.

1.4 This policy is **NOT** a Recruitment and Selection Guide and deals only with safer recruitment. The content of this policy is in line with Keeping Children Safe in Education September 2022.

2.0 Aims and Objectives

2.1 The aims of this safer recruitment policy are as follows;

- to help deter, reject or identify people who are unsuitable to work with pupils by having appropriate selection and appointment procedures
- to ensure that the best staff are recruited on the basis of their suitability, merits and abilities as measured against the job description and person specification
- to ensure that no applicant is discriminated against on any grounds as per the Equality Act 2010
- to ensure compliance with the Keeping Children Safe in Education 2023 statutory guidance for schools and colleges on safeguarding children and safer recruitment in education
- to ensure compliance with current employment legislation

2.2 It is recommended that this guidance is used in conjunction with the advice and support of your HR provider.

3.0 Roles and Responsibilities

3.1 It is the responsibility of the Headteacher and all other staff involved in recruitment to;

- ensure that the school operates safe recruitment procedures
- ensure that appropriate checks are carried out on all staff and volunteers who work at the school
- to monitor contractors and agencies compliance with this policy

3.2 In this school the Local Academy Committee has delegated responsibility to the Headteacher for all teaching staff appointments and all support staff appointments.

3.3 It is the responsibility of the Local Academy Committee to;

- ensure the school has effective policies and procedures in place for recruitment of all staff and volunteers
- monitor the school's compliance with them

4.0 Recruitment and Selection Procedure

4.1 Selection Panel

4.1.1 Any person with a **personal** or **pecuniary interest** in the appointment of a particular applicant must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision making.

4.1.2 At least one member of the selection panel will have completed Safer Recruitment Training[1]

4.2 Job Descriptions and Person Specifications

4.2.1 Every job description and person specification will make reference to the postholder's responsibility for safeguarding and promoting the welfare of children.

4.2.2 The person specification will include specific reference to suitability to work with children.

4.3 Advertisements

4.3.1 Adverts for all posts will include the school's commitment to Safeguarding and the fact the post is exempt from the Rehabilitation of Offenders Act i.e.;

This school is committed to safeguarding and promoting the welfare of children and young people/vulnerable adults and expects all staff and volunteers to share this commitment.

This position is subject to appropriate vetting procedures including a criminal record check from the Disclosure and Barring Service (formerly CRB) which will require you to disclose details of all unspent and unfiltered spent reprimands, formal warnings, cautions and convictions as part of the recruitment process.

4.4 Application Forms

4.4.1 Where the role involves engaging in regulated activity relevant to children, a statement will be included in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

4.4.2 All prospective applicants must complete, in full, an application form. The application form includes a statement that the information provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at point of interview. The application form will include the following:

- personal details, current and former names, current address and national insurance number;
- details of the applicants present (or last) employment and reason for leaving;

[1] School Staffing (England) (Amendment) Regulations 2014 mean that from 1 September 2014 training providers no longer have to be approved by the secretary of state.

- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
- qualifications, the awarding body and date of award;
- details of referees/references (see below for further information); and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

4.4.3 CV's or general letters of application will not be accepted.

4.4.4 Application forms and supporting information will be scrutinised fully and explored with the applicant where necessary to resolve any discrepancies or anomalies.

4.4.5 All applicants will also be provided in the application pack (or with a link to the website) with a copy of the Safer Recruitment policy, the Child Protection/ Safeguarding policy, and policy on the employment of ex-offenders.

4.5 Shortlisting

4.5.1 Shortlisted candidates will be asked to complete a self-declaration of their criminal record and information that would make them unsuitable to work with children. For example:

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

4.5.2 This information will only be requested from applicants who have been shortlisted. The information will not be requested in the application form to decide who should be shortlisted.

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

4.5.4 We will

- ensure that at least two people carry out the shortlisting exercise (it is recommended that those who shortlist carry out the interview for a consistent approach);
- consider any inconsistencies and look for gaps in employment and reasons given for them; and,
- explore all potential concerns.

4.5.5 Online Searches (NEW in KCSIE 2022) - In addition, as part of the shortlisting process we will carry out an online search as part of our due diligence on the shortlisted candidates. This search will be conducted by a senior member of the School staff who will not be involved in

the recruitment process. A consistent approach will be taken, and the results will be recorded in the 'Online Search Record' form (see Annex 2 for detail of what will be searched/ recorded). The purpose of the online search is to help identify any incidents or issues relevant to suitability to work with children, that have happened and are publicly available online, which we may want to explore with the applicant at interview.

4.6 References

4.6.1 References will always be obtained from the candidate's current employer. Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving will be obtained from the school, college, or organisation at which they were last employed.

4.6.2 References will include specific questions relating to the role applied for, a candidate's suitability to work with children, any substantiated allegations relating to children and/or any disciplinary action taken in relation to their work or contact with children as a result of which penalties or sanctions have either expired or remain in force.

4.6.3 References will also be used to confirm details provided by the applicant in the application form (such as the experience and qualifications claimed by the applicant).

4.6.4 References will always be sought and obtained directly from the referee – they will not be accepted directly from the applicant.

4.6.5 Where necessary, referees will be contacted by telephone or email in order to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.

4.6.6 Open references or testimonials will not be accepted, and only written references will be considered.

4.6.7 Where electronic references are received we will ensure that they originate from a legitimate source.

4.6.8 References will be sought on all shortlisted candidates, including internal ones, and will be obtained before interview so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview. Where it is not possible to obtain references prior to interview because of delay on the part of the referee a reference will be received and scrutinised prior to confirmation of appointment.

4.6.9 In all instances where an applicant currently works in a school or educational setting, a reference will **always** be sought from the Headteacher (or Chair of Governors for Headteacher appointments) of that establishment.

4.6.10 If a candidate for a position is not currently employed in a school, but has been in their past, we will check with the school, college or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

4.6.11 A minimum of two references will be received and scrutinised.

4.6.12 Information provided by the Headteacher for an internal candidate will be considered like a reference for an external candidate.

4.6.13 If a panel member knows something factual (i.e. that can be supported by evidence) about a potential candidate that other members may not know, the information will be shared so that the panel itself can decide if it is relevant.

4.6.14 Any information about past disciplinary action or allegations should be considered carefully when assessing the applicant's suitability for the post (including information obtained from the DfE Sign-in Teacher Services checks referred to below).

4.7 Interviews

4.7.1 Interviews will be required for all shortlisted applicants and will always be conducted face to face. Telephone interviews may be used at the shortlisting stage but will not be a substitute for a face to face interview.

4.7.2 Candidates will always be required to;

- Explain any gaps in employment
- Explain any anomalies or discrepancies in the information available to the selection panel
- Declare any information that is likely to appear on a DBS disclosure
- Demonstrate their attitudes, motives and values for working with children and young people, and their capacity to safeguard and protect the welfare of children and young people
- Bring with them evidence of their identity (photographic), address and qualifications. Original documents only will be accepted, and photocopies will be taken. Unsuccessful applicant's documents (copies) will be destroyed.

4.7.3 Pupils/students may be involved in the recruitment process in a meaningful way. Observing short listed candidates and appropriately supervised interaction with pupils/students is common and recognised as good practice.

4.7.4 All information considered in decision making will be clearly recorded along with decisions made.

5.0 Making the Offer of Appointment

5.1 An offer of appointment to a successful candidate, including one who has lived or worked overseas, is conditional upon satisfactory completion of the following pre-employment checks.

The Appointing Officer will;

- verify a candidate's identity, following the DBS identity checking guidelines https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-dbs-check-applications. It is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing

their name. Best practice is checking the name on their birth certificate, where this is available.

- obtain a certificate for an enhanced DBS check with barred list information where the person will be engaging in regulated activity. Note that when using the DBS update service you still need to obtain the original physical certificate
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- check that a candidate to be employed as a teacher, or to carry out 'teaching' work, is not subject to a prohibition order issued by the Secretary of State, using the DfE Sign-in Teacher Services website (formerly called 'Employer Access Online');
- check that a candidate to be employed in a management position within an academy is not prohibited from doing so (a section 128 direction), using the DfE Sign-in Teacher Services website. Individuals taking part in 'management" may include individuals who are members of proprietor bodies (including governors if the governing body is the proprietor body for the school), and such staff positions as follows: headteacher, any teaching positions on the senior leadership team, and any teaching positions which carry a department headship. Whether other individuals such as teachers with additional responsibilities could be prohibited from 'taking part in management' depends on the facts of each case;
- verify the candidate's mental and physical fitness to carry out their work responsibilities – PEAQ or Assessment of Fitness to Work;
- conduct other checks related to the requirements of the role e.g. driving licence or valid insurance;
- verify the person's right to work in the UK;
- if a person has lived, or worked outside the UK make any further appropriate checks (see para 16 below);
- verify professional qualifications, by requesting certificates of evidence as appropriate;
- for staff who work in childcare provision or who are directly concerned with the management of such provision we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009 by requiring signature on a declaration form.

5.2 <u>DBS Certificate</u>

5.2.1 A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. If the applicant has subscribed to it and gives permission, we may undertake an online update check through the DBS Update Service.

Before using the Update Service, we will:
a. obtain consent from the applicant to do so;
b. confirm the certificate matches the individual's identity; and
c. examine the original certificate to ensure that it is for the appropriate workforce and level of check, e.g. enhanced certificate/enhanced including barred list information.

5.2.2 Where we allow an individual to start work before a DBS is available, we will always ensure that the individual is appropriately supervised at all times and that all other checks, including a separate barred list check, have been completed.

6.0 <u>Agency and Third-Party Staff</u>

6.1 We will obtain written notification from any agency, or third-party organisation we use that the organisation has carried out the checks on an individual who will be working at the school that we would otherwise perform. This will include, as necessary, a barred list check prior to appointing that individual. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

6.2 Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at the school or college, which has disclosed any matter or information, or any information was provided to the employment business, we will obtain a copy of the certificate from the agency.

7.0 Volunteers

7.1 We will obtain an enhanced DBS check (which should include children's barred list information) for all volunteers who are working in regulated activity with children, i.e. where they are unsupervised and teach or look after children regularly, or provide personal care on a one-off basis.

7.2 We will prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. Under no circumstances will we allow a volunteer in respect of whom no checks have been obtained to be left unsupervised or allowed to work in regulated activity.

7.3 If we engage volunteers we will adopt the same recruitment measures as we would for paid staff. Where the volunteering role will be a one-off such as accompanying teachers and pupils on a day outing or helping at a school fete, such measures may be unnecessary provided that the person is not to be left alone and unsupervised in charge of children.

7.4 We will undertake a risk assessment and use our professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. In doing so we will consider:

- the nature of the work with children;
- what we know about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability;
- whether the role is eligible for an enhanced DBS check;

Details of the risk assessment will be recorded.

8.0 Governors (including local governing board members in an academy trust)

8.1 All Governors in maintained schools and any local governing board members in an academy trust must have an Enhanced DBS check. Any Governors who volunteer in our establishment will be treated on the same basis as other volunteers, that is, an Enhanced DBS check with a barred list check if they are to be engaged in regulated activity.

8.2 Following the stipulation in Keeping Children Safe in Education, we will also use the DfE Sign-in Teacher Services website to check if any person we propose to recruit as a governor (and any existing governor) is subject to a section 128 direction.

9.0 Proprietors of Academies (Trustees/ Directors)

9.1 All Trustees/ Directors of the academy trust will have an enhanced DBS check.
Checks will also be undertaken to confirm identity and if the individual lives or has lived outside of the UK, any such other checks as considered appropriate.

9.2 We will also ensure that any Trustee/ Director is not subject to a section 128 direction that would prevent them from taking part in the management of an academy (as detailed in para 5.1 above).

10.0 Contractors

10.1 Where we use contractors to provide services, we will set out our safeguarding requirements in the contract between the organisation and the school.

10.2 We will ensure that any contractor, or any employee of the contractor, who is to work at the school has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for contact with children, an enhanced DBS check (not including barred list information) will be required.

10.3 Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.

10.4 We will always check the identity of contractors and their staff on arrival at school.

11.0 Visitors

11.1 We will check identification of professional visitors upon their arrival to school and ensure that they sign in and out of the building. Where applicable, we will check that the visitor has the appropriate level of DBS check.

11.2 We will use our professional judgment about the need to escort or supervise visitors on school site.

11.3 Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children's education, careful consideration will be given to the suitability of any external organisations.

12.0 Alternative Provision

12.1 If we place a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil, and therefore need to be satisfied that the provider meets the needs of the pupil. We will obtain written confirmation

from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform in respect of our own staff.

13.0 Induction

13.1 All new employees will be given an induction programme which will include systems within the school which support safeguarding.

This includes (but is not limited to):

- the child protection/ safeguarding policy which should amongst other things also include the policy and procedures to deal with child on child abuse
- the behaviour policy which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- the staff behaviour policy (sometimes called a code of conduct) which should amongst other things, include low- level concerns, allegations against staff and whistleblowing
- the safeguarding response to children who go missing from education
- the role and identity of the designated safeguarding lead (and any deputies).

13.2 All staff members will also receive appropriate child protection training which is regularly updated.

13.3 All staff will be required as part of their induction to read and understand at least part one of Keeping Children Safe in Education 2022 statutory guidance.

14.0 Single Central Record

14.1 A single centralised record is kept in accordance with the DfE requirements. This is kept up to date by the Office Manager and the Headteacher and is retained securely by the school. It is checked termly by the Chair of LAC who is the Safeguarding Link governor. It contains the details of the following;

- all staff (including supply staff, teacher trainees on salaried routes and agency and third party supply staff, even if they work for one day) who work at the school
- regular volunteers who are engaged in regulated activity
- governors
- all members of the proprietor body, i.e. members and trustees of the academy trust.

14.2 The information recorded on these individuals is whether or not the following checks have been carried out or certificates obtained, and the date on which the checks were completed:

- an identity check;
- a barred list check;
- an Enhanced DBS check requested/ certificate provided;
- a prohibition from teaching check;
- a S128 check (where applicable - see above);
- further checks on people living or working outside the UK (see below);
- a check of professional qualifications, where required;
- a check to establish the person’s right to work in the United Kingdom;
- childcare disqualification declaration, where relevant

- (from September 2022 onwards) online searches

14.3 For supply staff, we will also include whether written confirmation (and the date) that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates.

14.4 A designated Governor will be responsible for auditing the Single Central Record and reporting their findings to the full Governing Body at least annually.

15.0 Record Retention

15.1 Copies of DBS certificates will not be retained as this is not a requirement of the duty to maintain the Single Central Record.

15.2 A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file.

15.3 Interview notes on unsuccessful applicants will be retained for a period of 6 months after which they will be destroyed.

16.0 Applications from Overseas Applicants

16.1 Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. In addition, schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. The Home Office guidance on criminal records checks for overseas applicants can be found on GOV.UK.

16.2 These checks could include, where available:

- criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions
- obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body. Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability.

16.3 Where this information is not available schools and colleges should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

17.0 A Wider Culture of Vigilance

17.1 St. Paul's First School is committed to providing the highest level of education and care to its pupils and to safeguarding and promoting the welfare of children and young people. It is recognised that safer recruitment does not end at appointment. Our school is committed to creating a 'safer culture' and will ensure the following:

- That there are clear procedures in place to monitor, support and review new entrants to the organisation
- That there are clear procedures for reporting concerns
- That any employee who reports a concern is supported in doing so and there is a clear commitment to taking appropriate action.

Annex: Policy Statement on the Recruitment of Ex-Offenders

Exemption from the Rehabilitation of Offenders Act 1974

Ex-offenders have to disclose information about spent, as well as unspent convictions if the job for which they are applying is exempted from the Rehabilitation of Offenders Act 1974.

How this affects school-based positions

All school-based roles are exempt from the Rehabilitation of Offenders Act as the work brings employees into contact with children who are regarded by the Act as a vulnerable group. Applicants for school-based jobs must, therefore, disclose all spent and unspent, unfiltered convictions.

All applicants who are offered employment in our organisation will be subject to a criminal record check from the Disclosure and Barring Service before an appointment is confirmed. This will include details of cautions, reprimands and warnings as well as spent and unspent, unfiltered, convictions. An enhanced DBS (check) may also contain non-conviction information from local police records which a chief police officer thinks may be relevant.

Having a criminal record will not necessarily bar someone from working in our school.

Criminal records will be taken into account for recruitment purposes only when the conviction is relevant.

When reaching a recruitment decision, the following factors will be taken into account:

- 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 the other relevant matters, and
- The circumstances surrounding the offence and the explanation(s) offered of the offending person.

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), we comply fully with the DBS code of practice and undertake to treat all applicants for positions fairly.

We undertake not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

We can only ask an individual to provide details of convictions and cautions that we are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).

We can only ask an individual about convictions and cautions that are not protected.

We are committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

We have this written policy statement on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.

We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.

We select all candidates for interview based on their skills, qualifications and experience.

All application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being conditionally offered the position.

We ensure that all those in the organisation who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, we will ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

We make every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.

We undertake to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing any conditional offer of employment.