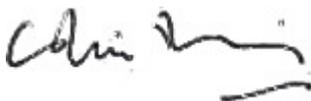




MOUNT HOUSE SCHOOL

SCHOOL POLICIES

SAFER RECRUITMENT

Review	Date	By
Last Reviewed	August 2018	
Next Review	August 2019	

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Introduction and Purpose of Policy

Mount House is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

	Initials	Provider
Person responsible for safer recruitment training	IDO	
The Director appointed to oversee appointments	CDI	
Staff who have completed safer recruitment training	TJM	West Sussex
Directors who have completed safer recruitment training	CDI	Online

The governing body ensure that the procedures and policies in place for the safe recruitment of all staff and volunteers are in accordance with the following and are effective;

Keeping Children Safe in Education (Sept 2016) (KCSIE) requirements,

ISI regulations (April 2015) (Part 4),

The Childcare Act 2006,

'Disqualification under the Childcare Act 2006' (Feb 2015),

Prevent Duty (April 2015, updated July 2015)

It is the responsibility of the head master, senior management and any other staff member nominated by the head master to;

- implement the school's safer recruitment procedures correctly
- ensure all staff and volunteers working at the school undergo appropriate checks
- monitor agencies and contractors' compliance with safe recruitment
- promote the welfare of pupils at all stages of the process

The school will work to ensure that at all times at least one person on the appointments panel will have undertaken safer recruitment training.

(This policy will be updated in response to any new requirements and regulations that appear before the date of the next review)

The School aims to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

The school is committed to education in a vibrant environment, which engages children of all faiths and backgrounds and offers the best possible care and education for pupils.

Safeguarding and the welfare of pupils are prominent in all that the school undertakes. All staff, Directors and volunteers share this commitment.

The school's commitment to providing a supportive and flexible working environment for staff is supported through the safe, effective recruitment and retention of competent, motivated staff members who form a diverse workforce comprising different backgrounds, skills and abilities.

The recruitment and selection process is efficient, effective and equal. We uphold our legal obligations and national agreements and do not discriminate against applicants on grounds of age, sex, sexual orientation, marital status, disability, race, colour, nationality, ethnic origin, religion or creed.

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

The aims of the school's safe recruitment policy are as follows:

- to follow safer recruitment procedures at all times
- to ensure compliance with all statutory requirements and relevant recommendations and guidance, including the recommendations of the Disclosure and Barring Service [DBS].
- to ensure that the school meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks
- 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 equitably and consistently, in line with the school's equal opportunities policy
- to ensure that no job applicant is treated unfairly on any grounds.
- to ensure sufficient staff/Directors receive training in safer recruitment processes
- to ensure all appointment panels contain at least one member who has been trained in Safer Recruitment

The main Acts relating to Safer Recruitment include:

- 'Disqualification under the Childcare Act 2006' (Feb 2015)

- Keeping Children Safe in Education [March 2015] [KCSIE]
- Working together to Safeguard Children [March 2015] [WT]
- Protection of Freedoms Act 2012
- The Childcare Act 2006, the Childcare (Disqualification) Regulations 2009.
- The Equality Act 2010 – which makes it unlawful to unjustifiably discriminate, directly or indirectly, against;
 - disabled people in employment, employees on the grounds of race, colour, nationality or ethnic origin. There are four types of discrimination, direct, indirect, victimisation and harassment
 - employees on the grounds of sex or marital status
 - employees on the grounds of religious belief or practice in employment.
 - employees on the grounds of age
- Education and Skills Act 2008
- Education Act 2002

In addition DfE advice on The Registration of Independent Schools and Part 4 of the ISI Regulations (April 2015) are relevant to Safer Recruitment.

Scope of this Policy

This policy refers and applies to staff directly recruited and employed by Mount House. In the Education (Independent Schools Standards) (England) Regulations 2010, staff are defined as: *“Any person working at the School whether under a contract of employment, under a contract for services or a volunteer involved in any regulated activity.”*

In the case of agency or contract workers, the School shall obtain written confirmation from the agency or company that it has carried out the appropriate checks.

Any staff who TUPE transfer into the School's staff, will be required to undertake the statutory requirements with regard to safer recruitment checks. **All peripatetic music staff and sports coaches must also be subject to the regulatory checks.**

Recruitment & Selection Procedure

Our policy and procedures involve consideration of how we safeguard and promote the welfare of our pupils at every stage of the process. The process begins with planning, ensuring that the advertisement makes clear the school commitment to safeguarding children. It then continues through short-listing, interviewing, appointing, checking the successful candidate according to statutory requirements, and induction. The policy demonstrates a consistent and thorough process of obtaining, collating, analysing and evaluating information from and about applicants.

Our procedures include;

- deciding upon whether the post meets the criteria for 'regulated' activity (Please see Govt Publication "Regulated Activity in Relation to Children: Scope" for the definition of Regulated Activity)
- obtaining comprehensive information from applicants and scrutinising the information
- ensuring that no person who is appointed carries out work, or intends to carry out work at the school in contravention of a prohibition order, an interim prohibition order or any direction made under section 128 of the 2008 Act or section 142 of the 2002 Ac, or any other disqualification, or restriction which takes effect as if contained in either such direction
- satisfactorily resolving any discrepancies or anomalies in information received
- obtaining two independent professional references in order to assess an applicant's suitability to work with children. We may also request a character reference depending on the position offered.
- holding a face to face interview that explores the candidate's suitability to work with children as well as his/her suitability for the post
- checking the applicant's identity, previous employment history and experience
- checking that candidates are medically fit to perform the duties required of the position by obtaining a self-declaration of fitness
- checking the applicants right to work in the United Kingdom
- where appropriate, checking the applicant's qualifications
- carrying out pre-employment checks appropriate to the type of employment advertised, which may include the mandatory enhanced criminal record check and obtaining an enhanced criminal record certificate before or as soon as practicable after the applicant's appointment (if such a certificate does not arrive before employment is due to begin then a barred list check must be obtained).
- Requesting sight of the applicant's original enhanced disclosure certificate
- following up appointment with a systematic induction programme

(Please see Appendix 2a for details of the types of employment and the pre-employment checks made for each type of appointment)

The Programme for appointing staff in regulated activity

All material that forms part of the appointment, including the candidate application and information pack, will be checked by the appointments panel and must meet the requirements of the school safer recruitment policy.

The advertisement

This will include a statement about the school's commitment to safeguarding and promoting the welfare of children. It will refer to the need for the successful candidate to undertake an enhanced criminal record check via the DBS.

The advert will also include:

- Job title
 - A reference to the school ethos
 - Location and contact details for the school
 - Salary and hours (including pro rata salary)- or details of how to access this information
 - A brief equal opportunities statement
 - Details of how to apply for the Application Pack
 - The advertisement will make no direct reference to sex, race, age, sexual orientation, religion/belief or disability.
 - An application pack will be sent to prospective candidates on request and will include at the least;
 - General information about the school
 - The selection procedures for the post
 - Information about the section of the school relevant to the role advertised
 - Details of the role in the job description
 - Qualifications, experience, skills and abilities required - summarising the details in the person specification
 - Details of all documents required as per-employment checks
 - Safeguarding policy or information on how to access this online
 - An application form together with a statement informing the candidate that;
 - completion of the form ensures that a common set of core data is received from candidates.
 - CVs drawn up by candidates will not be accepted in place of an application form.
 - Incomplete application forms will be returned to the candidate where the deadline for completed application forms has not passed.
-
- The job description will include:
 - the main duties and responsibilities of the post;
 - the individual's responsibility for promoting and safeguarding the welfare of children and young people that s/he is responsible for or comes into contact with.
 - The person specification will include:
 - the qualifications, experience, expertise and any other requirements needed to perform the role
 - the competences, skills and qualities that the successful candidate should be able to demonstrate
 - an explanation of how the above will be assessed during the selection process.

The Application Form

The School will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms.

Mount House will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. Candidates for employed posts will receive a Job Description and Person Specification for the role applied for.

As the position for which candidates are applying involves substantial opportunity for access to children, it is important that applicants provide the School with legally accurate answers. Upfront disclosure of a criminal record may not debar a candidate from appointment as the School shall consider the nature of the offence, how long ago and at what age it was committed and any other relevant factors. Information should be submitted in confidence enclosing details in a separate sealed envelope which will be seen and then destroyed by the Principal. If candidates would like to discuss this beforehand, they are asked to please telephone in confidence the Principal for advice.

Any unspent convictions, cautions, reprimands or warnings must be disclosed to the School. However, amendments to the Exceptions Order 1975 (2013) provide that certain spent convictions and cautions are 'protected' and are not subject to disclosure to employers, and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found at the Disclosure and Barring Service website.

The successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service ("DBS") for the position. Failure to declare any convictions (that are not subject to DBS filtering) may disqualify a candidate for appointment or result in summary dismissal if the discrepancy comes to light subsequently.

If the candidate is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. If the candidate is not currently working with children but has done so in the past, the School will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

Invitation to Interview

Mount House will short list applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. Short-listed applicants will then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail.

All formal interviews will include an interview with the Principal (or a delegated member of the Senior Leadership Team). At least one of the interviews will be with a member of staff who has undertaken safer recruitment training. The Chair of the Board of Directors should chair the panel for the Principal's/Finance Director's appointment. The interview will be conducted in person and the areas which it will explore will include suitability to work with children.

The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Principal (or the member of the Senior Leadership Team leading the interviews) as to whether or not an interviewer should withdraw. Should the Principal (or lead interviewer) have a conflict of interest, the delegated deputy lead interviewer shall decide whether he/she should withdraw.

Telephone interviews may be used at the short-listing stage but will not be a substitute for a face-to-face interview (which may be via visual electronic link). Unsuccessful candidates in the interview selection process will be informed in writing and thanked for their interest in the school.

All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

The School requests that all candidates invited to interview also bring with them:

- A current driving licence including a photograph or a passport or a full birth certificate;
- Original qualification certificates
- A utility bill or financial statement issued within the last three months showing the candidate's current name and address;
- Where appropriate any documentation evidencing a change of name;
- Where the candidate is not a citizen of a country within the EEA or Switzerland, proof of entitlement to work and reside in the UK.

If the disclosure held by an overseas candidate is considered insufficient to establish their suitability to work in the school, further evidence may be required from the applicant's country of origin. Such checks will be undertaken if the candidate has lived overseas for three months or more in the last five years

Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

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

The interview process will cover the candidate's suitability with relation to the requirements of the post, their subject knowledge, skills and competence, ability to work within a team, organisation and management skills linked to the post and contributions the candidate can make toward the extended curriculum and general life of the school.

During the interview and face to face, candidates will always be required:

- to explain satisfactorily any gaps in employment;
- to explain satisfactorily any anomalies or discrepancies in the information available to recruiters;
- to declare any information that is likely to appear on a DBS disclosure;
- to demonstrate their capacity to safeguard and protect the welfare of children and young people.
- To state whether they are subject to a prohibition order

In all interviews a report will be made to the police and/or the Children's Safeguarding Operations Unit (formerly the Teachers Misconduct Team) if a candidate is found;

- To be on List 99,
- Has a disclosure showing s/he has been disqualified from working with children by a court?
- Has provided false information in, or in support of, his/her application,
- Presents serious concerns regarding suitability to work with children.
- Conditional Offer of Appointment: Pre-Appointment Checks

A successful candidate will not be allowed to start work at the school until the following checks have been successfully completed:

- Receipt of at least two satisfactory references (if these have not already been received); (one of which must be from the applicant's most recent employer) which the school considers to be satisfactory;
- 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 identity and qualifications including, where appropriate, evidence of the right to work in the UK;
- A satisfactory enhanced DBS check and if appropriate, a check of the Barred List maintained by the DBS;
 - a check that that the candidate is not subject to a prohibition order issued by the Secretary of State; For a candidate to be employed as a teacher, confirmation from the National College for Teaching and Leadership that the applicant is not subject to a prohibition order. If qualified teacher status is not required the school will check the applicant is not subject to a prohibition order by application to the Employer Online service;

- Verification of professional qualifications, where appropriate;
- Verification of successful completion of statutory induction period (for teaching posts - applies to those who obtained QTS after 7 May 1999):- the relevant professional status requirements have been verified-e.g. GTC registration, QTS status (unless correctly exempted)
- Where the successful candidate has worked or been resident overseas such checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered
- confirmation that the applicant does not commence work in contravention of a direction under section 142 of the Education Act 2002 or section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from teaching or being involved in the management of an independent school
- Satisfactory medical fitness- the candidates medical fitness for the role from the school's medical adviser have been confirmed
- A disqualification by association declaration- confirmation that the applicant is not disqualified from working in connection with early or later years provision

Until the school has had sight of the original disclosure certificate, the applicant will be treated as unchecked and subject to the safeguards set out below. This requirement arises from both the DBS Employer Guidance and KCSIE. In addition, if an 'enhanced disclosure' is delayed, the head may allow the candidate appointed, if he/she has no contact with boarders in boarding accommodation or out of school hours, to commence work providing;

- the appointment is not formally confirmed
- the DBS application has been made in advance;
- if the person will be working in regulated activity, a satisfactory check of the barred list, plus vetting and other relevant checks have been completed satisfactorily
- appropriate safeguards are in place (for example, monitored supervision);
- safeguards are reviewed at least every two weeks;
- the person in question is informed of the safeguards and a note is added to the single central register and evidence kept of the measures put in place
- a note to explain the actions taken is advised on the central register of staff
- until a satisfactory enhanced DBS certificate has been seen. No member of boarding staff may be appointed.

It is the School's practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by the School in strictest confidence. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed workload, extra-curricular activities, layout of the School.

Mount House is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

The Recruitment of Ex-Offenders

The school will not unfairly discriminate against any applicant for employment on the basis of conviction or other details revealed. The school makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record, this will not automatically bar him/her from employment within the school. Instead, each case will be decided on its merits in line with the objective assessment criteria and guidance current at the time of application.

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

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

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 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.

If an applicant wishes to dispute any information contained in a disclosure, he / she can do so by contacting the DBS direct. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the school will, 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 leadership team and, as appropriate, their confidential support staff
- not retain disclosure information or any associated correspondence for longer than is necessary, usually 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
- prohibit the photocopying or scanning of any disclosure information

Retention of other records

The school will retain any relevant information provided on the application form (together with any attachments) on the personnel file of candidates who are offered and accept the position for which they have applied.

From April 2014, DfE guidance requires that schools retain copies of identity documents, right to work, 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.

The Immigration (Restrictions on Employment) Order 2007 requires employers in England and Wales to check and retain copies of passports, or alternatively birth/adoption certificates, belonging to people appointed on or after 29 February 2008.

It is normal practice for the school to retain personnel files for six years after the member of staff has left.

If the school wishes to retain the name and details of unsuccessful candidates on file for future vacancies, the candidates will be informed and offered the opportunity to remove their details from the school's records.

Prohibition Check

From September 2015, the school undertakes two types of “prohibition” checks:

- prohibition from teaching orders and
- prohibition from management of independent schools directions (also known as Section 128 directions).

If the management appointment is for a position described below, the school will check that the candidate is not prohibited from management of an independent school. The roles which require a check are:

- proprietors and members of proprietorial bodies, including Directors who are proprietors (but not non-proprietorial Directors)
- head teachers
- all member of the senior leadership team, whether or not they are teachers
- all teaching positions which carry a department headship.

(‘teaching work’ is defined as planning, preparing and delivering lessons for pupils, which includes distance learning and learning through computer aided techniques, and assessing and reporting on pupils’ development, attainment and progress)

References

The School will seek the references referred to in section 5 above for shortlisted candidates and may approach previous employers for information to verify particular experience or qualifications, before interview. If the candidate does not wish the School to take up references in advance of the interview, they should notify the School at the time of applying. The School will ask all referees if the candidate is suitable to work with children.

The School will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.

Having regard to the requirements of KCSIE (March 2015) a minimum of two references, to cover five years’ work history, will be sought. If the candidate is not currently working with children but has done so in the past, the school will contact the candidate’s previous employer, whilst he/she was working with children, for a reference. It is preferred that both a character reference and a professional reference are offered.

References are taken up prior to interview. If anomalies are identified in references, the referees will be contacted, by telephone or e-mail, for clarification and a detailed record kept of such exchanges. Discrepancies may also be probed during the interview. References are sought directly from the referee. References or testimonials provided by the candidate are unacceptable. Where necessary, previous employers who have not been named as referees may be contacted and a detailed written note will be kept of such exchanges.

Should a candidate strongly object to a current employer being approached prior to interview, the school will decide whether or not to accede to the request. If the request is granted, the school will then contact the referee following the interview. In such cases the school will ensure that references are received, scrutinised, and that any concerns are resolved satisfactorily before the person's appointment is confirmed and s/he starts in the role.

Referees should not be a relative or someone known to the applicant solely as a friend.

School employees are entitled to see and receive, if requested, copies of their employment references. References addressed "to whom it may concern" will not be accepted.

All referees will be sent a copy of the job description and person specification for the advertised post. Referees will always be asked specific questions about:

- the applicant's suitability for working with children and young people;
- whether the applicant has ever been the subject of disciplinary procedures, including time-expired warnings, that relate to the welfare and safeguarding of children;
- the applicant's suitability for the demands of the post.
- If the referee is a current or previous employer, they will also be asked to confirm the following: -
 - the applicant's dates of employment, job title/duties, reason for leaving, performance, and disciplinary record

Information contained in references will be compared with the candidate's application form to ensure that facts the referee provides about the candidate and his/her previous employment are consistent with those provided by the candidate. Any discrepancies will be discussed with the candidate.

Any information about past disciplinary action or allegations will be considered individually. Issues that were suitably resolved some time ago or were unfounded with no further issues raised, are less likely to cause concern than more serious or recent events. A history of repeated concerns or allegations over time will give cause for concern.

Additional references will be requested from applicants applying from countries that do not provide criminal record checks.

The Induction Programme

For all staff and volunteers newly appointed into the school, including teaching staff, regardless of experience, there is a comprehensive induction programme. The purpose of this is to;

- ensure candidates understand the school's safeguarding policy and procedures.
- check the candidate has read the relevant part(1) of KSCIE (July 2015), plus the school policies and procedures linked to child protection such as anti bullying, anti racism, physical intervention/restraint and internet safety.
- ensure candidates are clear about the standards of conduct and behaviour expected of staff and pupils within the school
- provide training and information about all school policies and procedures;
- support individuals in a way that is appropriate for the role to which they have been appointed;
- provide opportunities for the candidate to discuss any issues or concerns about their role or responsibilities
- enable the candidate's subject coordinator or mentor to identify any concerns regarding the settling in process, teaching, behaviour management, relationships with pupils or staff and rectify them swiftly

Criminal Records Policy

The School will refer to the Department for Education ("DfE") document, 'Keeping Children Safe in Education' July 2015 and any amended version in carrying out the necessary required DBS checks.

The School complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request [or accessed here:

<https://www.gov.uk/government/publications/dbs-code-of-practice>].

Regulated Activity Notes

- If volunteer is involved in the personal care of pupils then they are in regulated activity as Personal care work is always regulated activity
- If the person is a volunteer and what they do does not involve the personal care of pupils and they are supervised at all times they are not in regulated activity.
- If the person is a contractor and administers personal care or health care they are in regulated activity.
- If the person is a contractor and is involved in teaching pupils they are in regulated activity
- If the person is a contractor performing occasional or temporary non-teaching work (such as a quick plumbing task) they are not in regulated activity. In this instance the school will organise suitable supervision whilst the contractors are on site.

Contractors employed by cleaning and catering companies on a long-term basis are in regulated activity as they have the opportunity to be with pupils at any time.

The school checks with their respective companies and requests written confirmation that all the required checks have been completed successfully prior to the employees beginning work.

The identity of all employees of contractors will be checked by the school on arrival. If the employees of contractors may have unsupervised access to children, the school will check with the contractor that such employees have satisfactory DBS checks. The school will check the identity of such employees on their arrival at the school and will retain written confirmation from the contractor of the employees' checks.

The school ensures that all contractors and their employees are checked at regular intervals as they work.

The school is aware that supervised volunteers are not regarded as being in regulated activity. However, the school considers all volunteers as being in regulated activity. This is because there may be circumstances when the volunteer is with pupils in a directly unsupervised situation. Therefore, the school believes it is best practice to ensure all volunteers are subject to requiring an enhanced DBS certificate with barred list information.

The school requires references for some volunteers depending on the work they do, and holds informal interviews as well as checking with members of the school community as to the suitability of proposed volunteers

Visitors to the school who are supervised at all times are not regarded as being in regulated activity.

Enhanced Disclosure and Barring Service Check

Due to the nature of the work, the School applies for enhanced certification from the DBS in respect of all prospective staff members, Directors, unsupervised and where appropriate supervised volunteers engaging in regulated activity.

The school is not required to obtain an enhanced DBS check if, in the three months prior to beginning work in their new appointment, the applicant has worked:

- in a school in England in a post which brought them into regular contact with children or in any post in a maintained school since 12 May 2006; or
- in a college in England in a position which involved the provision of education and regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18 during a period of not more than three months prior to the appointment offered.

However, a separate barred list check will be completed for any such candidate should the school have any concerns.

If a candidate has a disclosure from a previous employer but does not fall within the three-month exception above and has not subscribed to the DBS Update service, the school will apply for a disclosure, including a barred list check. If the disclosure is delayed, a separate barred list check will be obtained in advance of the candidate starting work

A candidate with a disclosure from a previous employer at the enhanced level (including children's barred list) who subscribes to the Update service may give the school permission to check their status. The school will undertake an online Update check, which will provide information about any changes since the certificate was issued

A candidate with a standard level disclosure who subscribes to the Update service will be informed that the school will apply for a new disclosure, including a new barred list check, because the previous disclosure is not at the correct level.

Overseas staff

DBS checks will 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 the equivalent of a disclosure, if one is available in the relevant jurisdiction(s). In addition, advice on obtaining criminal record information from overseas police forces, published by the Home Office on GOV.UK. will be followed. The school will also have regard to Department for Education guidance on the employment of overseas-trained teachers from the European Economic Area to teach in England, and the award of qualified teacher status for teachers qualified in Australia, Canada, New Zealand and the US.

Trainee/student teachers

Where applicants for initial teacher training are successful in being offered a position, the school will ensure that all necessary checks are carried out. Trainee teachers undertake regulated activity, sometimes unsupervised; therefore, the school will obtain an enhanced DBS certificate and undertake a barred list check. When student teachers visit the school from their Colleges for teaching purposes or work placements, the school will request written confirmation from the College that the appropriate checks have been performed.

Peripatetic Staff

The school requires all necessary checks and DSB requirements are fulfilled.

Supply and temporary teaching staff agencies

Supply agencies who supply temporary staff to the school must complete the pre-employment checks which the school would otherwise complete for its staff, registering with the DBS on their own account. The school will check with the supply agency that the following checks have been carried out:

- The person's identity,
- Whether the person is barred from regulated activity relating to children in accordance with section 3(2) of the 2006 Act

- Whether the person is subject to any direction under section 128 of the 20018 Act or section 142 of the 2002 Act, including any prohibition, disqualification or restrictions, including the candidates on which such checks were made.
- Whether the person has relevant qualification
- A suitable disclosure check if the person is from overseas and the date the check was completed has been made
- An enhanced disclosure (JJor DBS status check)
- Whether the person has the right to work in the UK,

The school will show that these checks have been carried out on the single central register of staff to the extent relevant. The school will also record the date it has sight of the disclosure certificate, whether or not it discloses any information. The school will not retain a copy of the certificate on file.

Governors/proprietors

The school governors are volunteers. The school requires;

- an enhanced disclosure and barred list check
- proof of identity
- confirmation of the governor's right to work in the UK.
- If a governor who has been overseas is appointed appropriate checks will be made. If a governor or proprietor is to be involved with teaching, a prohibition from teaching check will be made.

All the above checks should be made prior to appointment or as soon as practicable after the appointment.

Chair of Governors

Before a chair of governors is appointed, the school informs the Secretary of State who will:

- carry out an enhanced criminal record check;
- right to work in the UK check;
- confirm the individual's identity; and
- if the fact that an individual lives or has lived outside of the UK make an enhanced check insufficient, such other checks as the Secretary of State considers appropriate

Contractors

When the school employs contractors whose employees have supervised access to pupils, such as, for example, catering or cleaning contractors the contractors are responsible for undertaking DBS checks. Before the school allows the employees to enter the site, the school requires written confirmation from the company that the required checks have been undertaken and are satisfactory. The school will check photographic identification of employees on arrival at the school. The school will keep records of the confirmations received from the contractor.

In the absence of statutory definitions, the school will, following DfE advice, determine when contractors are occasional or temporary, and therefore whether or not they are working in regulated activity. If the school decides the workers are not in regulated activity they will not be eligible for a barred list check, but the school may opt to carry out an enhanced check if they judge this necessary.

It is for the school to decide if whether emergency workmen are in regulated activity. If it is not possible to find workers at short notice who have already been checked, the discretion permitted in relation to occasional or temporary contractors will be exercised in good faith by the school. This will entail the issue being considered at the time of the work and the school will create and retain a note of the basis of a decision not to carry out checks. However if the work of emergency workmen does give them the opportunity to have contact with children then the school will ensure they are subject to a DBS check without a barred list check.

Self-employed contractors

The school will check to ascertain whether self-employed contractors have been checked by their professional associations. It is not possible for self-employed people to check themselves, but professional associations usually assist to enable their members to access work. If the self-employed person subscribes to the DBS update service, the school can check identity, view the original certificate and check online for updated information.

Self-employed contractors will be monitored at various intervals to ensure they have no opportunity to politically indoctrinate or radicalise at any time.

Volunteers

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

Unsupervised Volunteers

A number of people offer their services to the school as volunteers. The term "volunteer" is defined in the Police Act 1997 (Criminal Records) Regulations 2002, as 'any individual engaged in an activity which involves spending time, unpaid (except for travel and other approved out of pocket expenses), doing something which aims to benefit some third party and not a close relative. A volunteer cannot therefore:-

- receive payment (except for travel or other approved out of pocket expenses.
- be on a work placement
- be on a course that requires them to do this job role
- be in a trainee post that will lead to a full-time role/qualification.

All unsupervised volunteers will be monitored and supervised to ensure no political indoctrination or radicalisation of pupils takes place at any time.

In line with KCSIE recommendations, the school will obtain an enhanced DBS certificate with barred list check for all new volunteers in regulated activity who regularly help teachers or look after children on an unsupervised basis.

The school will also check the suitability and competence of the individual volunteer through either obtaining character references and/or an informal interview, and/or ascertaining whether the school community for any concerns.

Supervised Volunteers

On an occasion when a volunteer assists the school as a supervised volunteer who may regularly teach or look after children but are supervised at all times, they do not fall into the category of regulated activity. In such situations where individuals are acting as supervised volunteers, the school will ensure;

- supervision is conducted by a person who is in regulated activity;
- supervision is regular (on-going) and day to day; and
- the supervision is “reasonable in all the circumstances to ensure the protection of children”.

For new supervised volunteers not in regulated activity an enhanced DBS certificate will be required.

One-off' volunteers who offer to assist with day outings, school concerts and such do not require vetting checks. Such volunteers will not be unsupervised or undertake any kind of personal care.

All supervised volunteers will be monitored to ensure no political indoctrination or radicalisation of pupils takes place at any time.