



MORE HOUSE SCHOOL
KNIGHTSBRIDGE

SAFER RECRUITMENT POLICY

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Introduction and context

The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected, valued and listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment.

(Extract from the School's Safeguarding and Child Protection Policy)

Policy Statement

The School is committed to operating safer recruitment procedures in compliance with relevant legislation and best practice. The purpose of this policy is to set out the minimum requirements of the School's recruitment process which aims to:

- attract the best possible applicants to vacancies;
- deter prospective applicants who are unsuitable for work with children or young people;
- identify and reject applicants who are unsuitable for work with children and young people.

Key elements of safer recruitment are:

- robust recruitment and selection processes;
- rigorous vetting and checking processes; and
- strong induction, probation, appraisal and performance management systems.

This Policy covers the first two matters and should be considered in conjunction with the following Associated Policies:

Associated Policies

Appraisal Procedures – Teaching Staff and Support Staff
Disclosures and Disclosure Information (Employee Handbook)
Equal Opportunities and Diversity (Employee Handbook)
Privacy Notice
Recruitment & Selection (Employee Handbook)
Safeguarding and Child Protection Policy
Staff Induction Procedure
Document Retention Schedule

Planning and Advertising

- Planning is vital to successful recruitment. Each recruitment plan will identify who should be involved, assign responsibilities, and ensure sufficient time is set aside for the work needed at each stage so that safeguards are thorough and not overlooked. For example, the School recognises that it is important to organise the selection process to allow references to be obtained on short listed candidates **before** interview;
- A copy of the School's Recruitment and Selection Checklist that provides detail of requirements for each stage of the recruitment process can be found in Appendix 1 and the Staff Handbook on the S: Drive and Firefly, Appendix 5. The recruitment process is also shown schematically in Appendix 2.
- The School recognises it is important to be clear about what mix of qualities, qualifications and experience a successful candidate will need to demonstrate. These requirements will be clearly set out in the advertisement for the post to prevent unwanted applications;

- Advertisements for posts, whether in newspapers and publications, or on-line, will include the statement:

“The School is committed to safeguarding children and young people and expects all staff to share this commitment. All employees are subject to satisfactory Enhanced Disclosure and Barring Services (DBS) Checks.”

Inviting Applications

- Applicants will be supplied, as a minimum, with the following:
 - a Job Description which, in addition to explaining the job purpose, context and the main requirements of the job, will include information explaining what the responsibilities are regarding safeguarding and promoting the welfare of children along with the need to update training in this regard, if applicable;
 - a “Person Specification” providing details of necessary qualifications, experience, skills and knowledge, and key competencies including criteria that reflects a commitment to safeguarding that is relevant to the School and the role;
 - the School’s Safeguarding Policy;
 - the School’s Safer Recruitment Policy (this document);
 - the selection procedure for the post; and
 - an Application Form.

Application Form

- All applicants must complete, in full, an application form which includes, inter alia, the following:
 - full identifying details of the applicant including current and former names, current address, and National Insurance Number;
 - date of birth to ensure correct identification of the candidate (not be used for short listing purposes);
 - a statement of any relevant education, training and qualifications;
 - a full history in chronological order since leaving secondary education, including periods of any post-secondary education or training, part-time and voluntary work as well as full-time employment, with start and end dates;
 - details/explanations for periods not in employment, education or training, and reasons for leaving employment;
 - a safeguarding declaration;
 - permission for details of their DBS to be retained on a confidential file for the period of their employment and for the School to carry out on line DBS Update Service checks where applicable; and
 - details of referees. Two employment references are required, one of which should be the applicant’s current or most recent employer.

Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. A curriculum vitae will not be accepted in place of the completed Application Form. A copy of the School’s standard Application Form can be found in the Staff Handbook on the S: Drive and Firefly, Appendix 3.

Short-listing and References

- Short-listing of applicants will be against the “Person Specification” for the post;
- Where possible, references will be taken up before the selection stage, so that any discrepancies can be probed during interview;

- References will be sought directly from the referee. References or testimonials provided by the applicant will never be accepted;
- Where necessary, referees will be contacted by telephone or email to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges;
- Where necessary, previous employers who have not been named as referees will be contacted to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges; and
- Referees will always be asked specific questions about:
 - the applicant's suitability for working with children and young people;
 - any disciplinary warnings, including time-expired warnings, that relate to the safeguarding of children;
 - the applicant's suitability for this post.

A copy of the School's standard Reference can be found in the Staff Handbook on the S: Drive and Firefly, Appendix 4.

The Selection Process

- Selection techniques will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of short-listed applicants and where appropriate involve a taught lesson (as this is a good indicator of suitability to work with children from a safeguarding perspective);
- interviews will always be face-to-face unless there are exceptional circumstances that require a Skype interview. Telephone interviews may be used at the short-listing stage but will not be a substitute for a face-to-face interview;
- interviews will not be on a 1:1 basis but be conducted by an interview panel of at least two people;
- interviewers will be well briefed and at least one will have successfully received accredited training in safer recruitment procedures;
- the interview will include value based questions which will help explore the applicant's attitudes in terms of keeping children safe;
- applicants will always be required to:
 - explain satisfactorily any gaps in employment;
 - explain satisfactorily any anomalies or discrepancies in the information available to recruiters;
 - declare any information that is likely to appear on a DBS disclosure; and
 - demonstrate their capacity to safeguard and protect the welfare of children and young people.

Applicants will be required to provide Pre-employment Checks documentation when they attend an interview.

Conditional Offer of Appointment

Any offer of appointment to the successful applicant will be conditional upon receipt of satisfactory pre-employment checks and completion of any probationary period applicable. Regulated employment can only commence on receipt of an appropriate DBS certificate. This will be stated at interview and in the offer letter.

Applicants are required to sign a contract incorporating the School's standard Terms and Conditions of Employment once pre-employment checks have been satisfactorily completed.

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Pre-employment Checks – New Staff

In accordance with guidelines provided by the Department of Education and Independent Schools Inspectorate, the School carries out the following pre-employment checks:

- verification of identity and address. Where an applicant has changed his/her name by deed poll or any other mechanism (e.g. marriage, adoption, statutory declaration) he/she will be required to provide documentary evidence of the change;
- obtained and scrutinised at least two satisfactory independent, professional references;
- proof of date of birth so that the School may verify and check any unexplained discrepancies in the employment and education history of the applicants;
- validation of qualifications by review of original certificates;
- for roles in regulated activity* obtained a satisfactory Enhanced DBS certificate and confirmation that the applicant is not named on the Barred List;
- verification of the applicant's mental and physical fitness to carry out their work responsibilities. It is the School's practice that all applicants to whom a conditional offer of employment is made must complete a Health Questionnaire. The information contained in the questionnaire will be reviewed against the Job Description and the Person Specification for the role, together with details of any other physical or mental requirements (e.g. proposed timetable, extra-curricular activities, layout of the School, etc). If there are any doubts about an applicant's fitness the School will seek a medical opinion from a specialist or request that the applicant undertakes a medical assessment;
- verification of the applicant's right to work in the UK;
- if an applicant has lived or worked outside the UK, make further checks as appropriate;
- confirmation of applicants National Insurance Number (by review of P45, P60 or National Insurance Card); and
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

** Regulated activity means a person who will be:*

- *Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or*
- *Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or*
- *Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not*

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors

All governors will have:

- An enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- Confirm they are not subject to a section 128 direction made by the Secretary of State;
- The chair of the board will have their DBS check countersigned by the secretary of state.

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Induction and Probationary Period

- All staff who are new to the School will receive induction training that will include the School's safeguarding policies and guidance on safe working practices;
- New staff are paired with a mentor (usually the Head of Department or member of the Senior Management Team), who will guide the mentee in the first year of their time at the school; and
- The mentor will provide feedback to a Co-Head, who will meet the mentee at least once each half term in order to provide support and discuss the feedback received.

Retention of Records

If an applicant is appointed, the School will retain any relevant information provided on their application form (together with any attachments) on their personnel file. If the application is unsuccessful, all documentation relating to the application will be confidentially destroyed after six months.

The School complies with the provisions of the DBS Code of Practice for Retention and Security 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 the Designated Safeguarding Lead and Designated Safeguarding Lead Deputy, the Bursar and the Co-Heads;
- not retain disclosure information or any associated correspondence for longer than is necessary. Generally, this will be for a maximum of six months. For successful applicants, 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 and the unique number issued by the DBS;
- ensure that any disclosure information is destroyed by suitably secure means such as shredding; and
- prohibit the photocopying or scanning of any disclosure information.

The School also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information and has a written policy on these matters which is available on request.

COVID-19

From a practical perspective there has been some necessary change to the way in which some checks are carried out during the COVID-19 pandemic and, in line with Government guidance, the School will where appropriate adapt its normal procedures as follows:

- Identity checking

The DBS identity checking guidelines have been amended as a result of COVID-19. The normal position under the DBS identity checking guidelines is:

- i. the identity checker for the school must examine the applicant's identity documents face-to-face with the applicant or via a video link; and
- ii. the identity checker must have sight of the **original** identity documents so they can be checked for indicators of fraud.

The COVID-19 position allows identity documents to be viewed over video link and the identity checker to view **scanned** images of the identity documents. The DBS say this route should only be used for urgent cases where the normal guidelines cannot be followed.

- Verifying right to work in the UK

Right to work checks continue to be necessary and it remains an offence to knowingly employ anyone who does not have the right to work in the UK. Again, however, there is an amended procedure in place for checking a person's right to work status set out in government guidance called 'Coronavirus (COVID 19): right to work checks' (RTW Guidance).

The RTW Guidance states that employers must continue to check the prescribed documents. However, the way in which these documents are checked has been adjusted. As of 30 March 2020:

- checks can be carried out over video calls; and
- applicants can send scanned documents or a photo of documents.

- Checking qualifications

There are likely to be similar difficulties with seeing original documents when checking an applicant's qualifications. Therefore, if necessary scanned copies of documents to verify qualifications during the recruitment process will be used.

- References

Issues may be experienced when trying to obtain references if the school / previous employer is closed or the referee has been furloughed. In those circumstances the School will consider alternative referees but will always obtain a reference from the current/most recent employer and the most recent employer where the applicant worked with children (if different).

- Overseas checks

Similarly, it may prove difficult to obtain overseas checks for an individual due to the lockdown measures in place in a particular country however the School will continue to obtain overseas checks once restrictions ease, before regulated work commences.

- All other checks are still required and there are no temporary measures in place relating to them.

For any check carried out following these temporary procedures the document will be marked "*adjusted check undertaken on [insert date] due to COVID-19*".

The same note will be added to the SCR.

Once social distancing measures are relaxed the School will re-check anyone appointed using the adjusted process within eight weeks of COVID-19 measures ending. Copies of the original documents will be taken, dated and retained

Policy on Recruitment of Ex-Offenders

The School will not unfairly discriminate against any applicant based on conviction or other details revealed and makes appointment decisions based on 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 accordance with the objective assessment criteria set out below.

Applicants for 'regulated positions'* must declare all previous convictions, including those which would normally be considered 'spent' under the Rehabilitation of Offenders Act 1974. Failure to disclose a previous conviction may lead to an application being rejected or, if the failure is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. Failure to disclose a previous conviction may also be a criminal offence.

Under the relevant legislation, it is unlawful for the School to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children or vulnerable adults, or to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence.

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. If the School receives an application from a disqualified person, is provided with false information in, or in support of an applicant's application; or the School has serious concerns about an applicant's suitability to work with children, it will report the matter to the Police, and the DBS.

**as defined in the Protection of Children Act 1999 (as amended by the Criminal Justice and Courts Services Act 2000)*

Assessment criteria

If 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 offered by the convicted person.

High Risk Criteria

If the vacant post involves regular contact with children, it is the School's 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 vacant post involves access to money or budget responsibility, it is the School's 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 vacant post involves some driving responsibilities, it is the School's policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

Assessment procedure

If 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 risk assessment form must be signed by the Designated Safeguarding Lead and a Co-Head before a position is offered.

If an applicant wishes to dispute any information contained in a disclosure, he/she can do so by contacting the DBS directly. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the School will, where practicable, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

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 confirmation that these checks have been completed before 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 completes for its staff. Again, the School requires 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 a contractor or agency.

More House School Recruitment and Selection Checklist

	Person Responsible	Evidence Required	Initials	Date
Planning: <ol style="list-style-type: none"> 1. Timetable decided and interviewers identified 2. Job Description (JD) and Person Specification (PS) completed 3. Other documents to be provided to applicants reviewed and updated if needed: <ol style="list-style-type: none"> a. School's Safeguarding Policy b. School's Safer Recruitment Policy c. Selection procedure for the post d. Application Form. 4. Check recruitment agency cleared for regulated activity and review Safer Recruitment policy they have in place 	<ol style="list-style-type: none"> 1. Interviewer 2. Co-Head responsible for recruitment 3. Co-Heads 4. Director of Pastoral Care 	<ol style="list-style-type: none"> 1. Copy of published timetable 2. Copy of JD and PS 3. Confirmation of agency on-boarding checks carried out initialled on Recruitment and Selection checklist and copy of documentation kept in Director of Pastoral Care's office 		
Vacancy advertised and where appropriate includes: <ol style="list-style-type: none"> 1. Reference to Safeguarding Policy 2. Need for successful applicant to be DBS checked 	Co-Head responsible for recruitment	Copy of advert placed		
Applications scrutinised for: <ol style="list-style-type: none"> 1. Full identifying details including current and former names, date of birth, current address, and National Insurance Number 2. Relevant education, training and qualifications 3. A full history in chronological order since leaving secondary education 4. Details/explanations for periods not in employment, education or training, and reasons for leaving employment 5. A safeguarding declaration 6. Permission for details of DBS to be retained for the period of employment and for the School to carry out on line DBS Update Service checks where applicable 7. Details of two employment referees including current or most recent employer 	<p>Interviewer responsible for scrutiny</p> <p>Director of Pastoral Care responsible for sign-off</p>	Evidence of completion on Application Form in "School use only" box		
Short-list prepared	Interview panel	Minutes from panel meeting		

References requested: <ol style="list-style-type: none"> 1. Standard Reference sought directly with named referees 2. Standard Reference sought from current or most recent employer 	Co-Head responsible for recruitment (supply) or Bursar	References		
References received: <ol style="list-style-type: none"> 1. Checked against information on application 2. Scrutinised for any discrepancy 3. Any discrepancy/issue taken up with referee and/or applicant (at interview) 	Interviewer responsible for scrutiny Director of Pastoral Care responsible for sign-off	Evidence of completion on Reference form in "School use only" box		
Interview: <ol style="list-style-type: none"> 1. Invitation to interview includes list of documents to be brought for checking 2. At least 2 interviewers, one trained in Safer Recruitment 3. Interviewers have agreed questions/assessment criteria/standards and issues 4. Suitability for work with children explored and interviewers' assessment recorded 	Interviewer	<ol style="list-style-type: none"> 1. Proof of receipt of documents 2. Interview notes 3. Evidence of review by Director of Pastoral Care on interview notes 		
Conditional offer of appointment: <ol style="list-style-type: none"> 1. For regulated employment, conditional on satisfactory pre-employment checks 2. For non-regulated employment on completion of probationary period 3. Sign-off Director of Pastoral Care 	Co-Heads or Bursar	Written confirmation of sign-off Director of Pastoral Care Offer Letter		

Pre-employment checks sought: <ol style="list-style-type: none"> 1. Verification of identity (including name changes) and address. 2. Photo ID 3. Obtained and scrutinised at least two satisfactory references. 4. Proof of date of birth and checked for any unexplained discrepancies in the employment and education history. 5. Validation of qualifications by review of original certificates. 6. Enhanced DBS certificate and confirmation not named on the Barred List 7. DfE prohibition lists checked & teacher reference number confirmed by Director of Pastoral Care. 8. Verification of mental and physical fitness to carry out work responsibilities. 9. Verification of the applicant's right to work in the UK. 10.If an applicant has lived or worked outside the UK, further checks as appropriate. 11.Confirmation of National Insurance Number 12.Privacy statement signed 13.Safer Recruitment checks and reviews are evidenced 14.Any Risk Assessments approved by Co-Head with oversight for Safeguarding 	Review by Director of Pastoral Care Final sign-off Bursar	Recruitment and Selection checklist initialled Personnel File checklist completed Evidence of completion and approval on Personnel File checklist		
Contract of Employment signed	Bursar	Personnel File checklist		
Safeguarding Induction completed	Director of Pastoral Care	Safeguarding Induction certificate		
Retention of Records <ol style="list-style-type: none"> 1. All documentation relating to the application placed in Personnel File 2. Relevant pre-employment checks documentation placed in Personnel file 3. Completed School Recruitment and Selection form placed in Personnel File 4. Copy of signed Contract of Employment placed on Personnel File 5. Copy of Safeguarding Induction declaration placed on Personnel File 6. Single Central Register updated 	Set-up Bursar Termly sample audit Governor with oversight for Safeguarding Director of Pastoral care annual audit of SCR Bursar and Clerk to the Governors annual	Specification of annual and termly audits and risk assessment in Termly Safeguarding meeting Terms of Reference and completion and outcome of these minuted.		

	audit of new personnel files Annual Deep Dive risk assessment - Bursar			
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Note: if the Director of Pastoral Care is absent responsibilities transfer to the Acting DSL

