

CHRIST'S HOSPITAL

SAFER RECRUITMENT POLICY & RECRUITMENT AND SELECTION PROCEDURE

1. Introduction

- 1.1 Christ's Hospital recognises that the safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in education and, in line with legislative requirements, Christ's Hospital takes very seriously its duty of care for all pupils. To safeguard and promote the welfare of all its pupils, Christ's Hospital is committed to a thorough and consistent Safer Recruitment Policy and, as an employer, Christ's Hospital expects all staff, contractors, governors, visitors and volunteers to share in this commitment. This policy refers to the paid employees and unpaid volunteers working at Christ's Hospital and Christ's Hospital Enterprises Ltd (CHEL).
- 1.2 Christ's Hospital is also committed to providing a supportive working environment for its staff. Christ's Hospital recognises that, to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment. No employee or volunteer can start work in any post until all the pre-employment checks relevant to their post have been completed. Failure to do so may result in formal action being taken. A separate policy relates to the hire and management of contractors.
- 1.3 The aims of the Safer Recruitment Policy & Recruitment and Selection Procedure are as follows:
- to ensure that the best possible people are recruited based on their merits, abilities and suitability for the position;
 - to ensure that all job applicants are considered equitably and consistently;
 - to ensure that all job applicants are treated fairly, regardless of their race, nationality, ethnic or national origin, religion or religious belief, sex, gender reassignment, sexual orientation, pregnancy, marital status, disability or age;
 - to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education (KCSIE) – current edition September 2025 and successive versions, the Prevent Duty Guidance for England and Wales – current edition 2023 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS) and to ensure that that each candidate has the right to work in the UK, in compliance with UK legislation and the UK Visas and Immigration (UKVI) requirements;
 - to ensure that Christ's Hospital meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks fully and in good time. Current members of Christ's Hospital staff involved in the recruitment and selection of new staff are responsible for familiarising themselves with and complying with the provisions of this policy;
 - to ensure that all nominated employees involved in the recruitment and selection process have undergone online safer recruitment training or other suitable safer recruitment training within the last three years.

- 1.4 Christ's Hospital has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm to, a child, or if there is reason to believe the member of staff has committed one of several listed offences, and has been removed from working (paid or unpaid) in Regulated Activity or would have been removed had they not left. The DBS will consider whether to bar the person.
- 1.5 Data protection: the data collected as part of the recruitment process will be confidential and will be processed for the purposes of staff selection. The successful applicant's data will be held in their personal record. Further information is set out in the Christ's Hospital Privacy Notice, available on the intranet or website.
- 1.6 The recruitment and selection process will ensure the identification of the person best suited to the job at Christ's Hospital based on the applicant's abilities, qualification, experience and merit as measured against the job description and person specification.
- 1.7 The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation and relevant safeguarding legislation and statutory guidance. If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they 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 process.

2. Definitions

- 2.1 **Barring check** – a check conducted by the Disclosure and Barring Service that is additional to the enhanced disclosure that includes: for a children's check, a check of the DBS Children's Barred List and/or, for an adult check, a check of the DBS Adults' Barred List. It is also possible to check if an individual is on the Barred List through the Department for Education – Employment Services portal.
- 2.2 **Contractor** – an individual who undertakes work at Christ's Hospital irrespective of whether it is on a long-term or short-term basis, under a contract for services. They are not on the payroll of Christ's Hospital, but they are on the payroll of the organisation that employs them, or they are self-employed.
- 2.3 **Criminal records check** – a check conducted by the Disclosure and Barring Service, see enhanced disclosure and barring check. Checks are carried out for all staff over the age of 16.
- 2.5 **Employee** – an individual who works at Christ's Hospital and is on the payroll. This includes full and part time staff, on permanent, fixed term, casual or temporary contracts.
- 2.6 **Enhanced disclosure** – a check conducted by the Disclosure and Barring Service, which includes a check of the Police National Computer records plus other information held by police such as interviews and allegations. This information must be relevant to the

sector/role for which the disclosure is requested and be approved by the police for inclusion on the certificate.

2.7 **Regulated Activity** – The Department for Education (DfE) has defined Regulated Activity as “A person will be in ‘Regulated Activity’ if as a result of their work they:

- will be responsible, on a regular basis, in any setting for the care or supervision of children; or
- will regularly work in a school or college at times when children are on school or college premises where the person’s work requires interaction with children, whether the work is paid (unless they are a supervised volunteer), or whether the person is directly employed or employed by a contractor; or
- in a college, will regularly have contact with children under 18 years of age”.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

In a school a supervised volunteer who regularly teaches or looks after children is not in Regulated Activity.

2.8 **Volunteer** – an individual who undertakes work at Christ’s Hospital but is not paid for doing so.

3. **Recruitment and selection procedure**

3.1 No recruitment for any post other than a like-for-like replacement already in the budget should commence without the [Recruitment Request](#) Form being completed and returned to HR – See Appendix A for copy of form and details of staff involved in the recruitment process. For like-for-like replacement, the Recruitment Request form should be completed as good practice.

3.2 All applicants for employment (which includes permanent, temporary or contracting staff and may involve volunteers) are required to complete an application form providing information about their academic and employment history and their suitability for the role. Incomplete application forms will be considered as presented and applicants are only given the opportunity to complete them more fully in exceptional circumstances.

3.3 Curriculum vitae will not normally be accepted in place of the completed application form but may be submitted in addition. The requirement for an application form is to ensure a consistent approach in the collation of data applicable to the role and to avoid any risk of discrimination.

3.4 A job description and person specification for the role will normally be made available to applicants. Applicants may then be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail. Interviews will involve different activities depending on the role, including panel interviews with staff and pupils, an observed lesson, a pupil panel or discussion, a practical and/or skills-based test. Applicants will also have an opportunity to see the school site which may include a site tour.

- 3.5 The recruitment process must include a person who has completed the NSPCC 'Safer Recruitment in Education' training or equivalent in the period of not more than three years prior to the recruitment process starting. The minimum recruitment process that will satisfy the requirements of all regulatory bodies and the inspectorate is an interview and meeting with HR to ensure necessary pre-employment checks are carried out. In some cases, work-based assessments or equivalent will be required. For hiring managers, please refer to Appendix B for the Recruitment Process Map and Appendix C for supporting notes. This gives more detail on the application process, short-listing candidates, interviews and assessments and the selection decision.
- 3.6 Shortlisting - Christ's Hospital will conduct a shortlisting exercise by reviewing all application forms received to determine which applicants will be invited for interview. The shortlisting exercise will usually be conducted by two members of staff who will ideally also be involved in the interview process.
- 3.7 Interview - shortlisted applicants may then be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail. All shortlisted applicants will be tested at interview about their suitability to work with children and at least one person who has completed Safer Recruitment training will be on the panel. Should there be any gaps in academic or employment history, a satisfactory explanation must be provided at interview. Verification of the applicant's identity and right to work is carried out at this stage.

4. Pre-employment Checks

- 4.1 This section sets out the requirements for checks to be made on those wishing to be employed as either a member of staff or a volunteer at Christ's Hospital.
- 4.2 In accordance with the requirements of the DfE, Independent Schools Standards Regulations, and Boarding Schools National Minimum Standards, Christ's Hospital carries out several pre-employment checks in respect of all prospective employees.
- 4.3 Any offer of employment will be conditional on the following:
- a. The agreement of a mutually acceptable start date and signature of a contract incorporating Christ's Hospital's standard terms and conditions of employment.
 - b. Verification of identity and address and evidence that the candidate has the right to work in the UK, in compliance with UK legislation and the UKVI requirements (HR can provide further guidance).
 - c. Receipt of two references (ideally both of which will be from the applicant's most recent employers) which Christ's Hospital considers satisfactory.
 - d. Receipt of an Enhanced Disclosure, with, where appropriate, a barring check, from the Disclosure and Barring Service with which Christ's Hospital is satisfied, and where relevant, the necessary overseas documentation (details in the Recruitment Process Map, Appendix C).
 - e. Satisfactory medical clearance following review of a pre-employment questionnaire by Christ's Hospital's occupational health advisors.

- f. Satisfactory online search checks to check suitability to work with children
- g. Receipt of a satisfactory check confirming that any individual to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, a sanction or restriction imposed by the General Teaching Council for England (GTCE), or any restriction or sanction imposed by any international professional regulating authority.
- h. Verification of the applicant's professional qualifications as appropriate.
- i. Successful completion of an agreed probationary period, confirmed in writing.
- j. If the individual is involved with the management of Christ's Hospital, receipt of a satisfactory check confirming that the individual is not subject to a prohibition order issued by the Secretary of State. Appendix D sets out the roles that the organisation considers are within the criteria of Management of Independent Schools as defined by the DfE.
- k. Where appropriate, confirmation that the applicant is not disqualified from working in connection with early or later years provision.

4.4 Verification of identity, qualifications and right to work in the UK

- 4.4.1 All applicants who are invited to a formal interview will be required to bring evidence of their identity, their qualifications, and their right to work in the UK.
- 4.4.2 These documents will be used to satisfy the requirements of:
 - UKVI - to prove the individual's right to work in the UK;
 - DBS – to prove the identity of the individual to proceed with an Enhanced DBS check; and
 - qualifications – which evidence any educational and professional qualifications referred to in their application form and/or which Christ's Hospital requests in the person specification.
- 4.4.3 If the individual is unable to satisfactorily meet these requirements, any conditional job offer made will be withdrawn.
- 4.4.4 Full details of the evidence required as proof of identity for the purposes of the DBS and of evidence of the right to work in the UK are given in Appendix E.
- 4.4.5 All professional posts will require proof of professional qualifications and status.
- 4.4.6 Where an applicant has changed their name by deed poll or any other mechanism (e.g., marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change. The DBS offers a confidential checking service for transgender applicants in accordance with the Gender Recognition Act 2004. This is known as the sensitive applications route and gives transgender applicants the choice not to have any gender or name information disclosed on their DBS certificate that could reveal a previous identity. More information is available here: <https://www.gov.uk/guidance/transgender-applications>.

4.5. References

- 4.5.1 All offers of employment will normally be subject to the receipt of a minimum of two satisfactory references, ideally both of which are from the applicant's most recent employers. If this is not possible, the applicant should give a suitable professional referee. Character references or university/college/school references will be taken up where professional references are impossible to obtain (e.g., for those leaving education with limited work history). A referee cannot be a relative or someone known to the applicant solely as a friend.
- 4.5.2 If an applicant has previously worked in an environment with children, but is not currently working with them, a reference will be sought from this source irrespective of whether this was their most recent employer.
- 4.5.3 All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. The referee will be asked to confirm:
- the applicant's dates of employment, salary, job title/duties, reason for leaving (if known), performance and disciplinary record;
 - whether the applicant has ever been the subject of disciplinary procedures;
 - whether the applicant has ever been involved in issues related to the safeguarding and welfare of children (including any in which a disciplinary sanction has expired);
 - whether the applicant has ever been involved with extremism;
 - whether any allegations or concerns have been raised about the applicant that relate to the safeguarding and welfare of children or young people or behaviour towards children or young people.
- 4.5.4 Christ's Hospital will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials.
- 4.5.5 Christ's Hospital will compare all references with any information given on the application form. Any discrepancies, gaps, or inconsistencies in the information will be taken up with the applicant before any appointment is confirmed.
- 4.5.6 Should Christ's Hospital assess it as appropriate, or there are concerns regarding any reference it receives, Christ's Hospital may decide to contact a referee by telephone to verify the source of the reference.

4.6 Disclosure and Barring Service (DBS)

- 4.6.1 Due to the nature of its work, Christ's Hospital applies for enhanced criminal record certificates from the DBS in respect of prospective staff members using an umbrella body. A satisfactory enhanced disclosure is required for all eligible posts at Christ's Hospital. Where the individual will be engaged in a role that deemed to be 'Management of an Independent School', appropriate additional checks will be made. See appendix D for relevant roles.

Christ's Hospital requires applicants to submit their DBS certificate to Human Resources. Human Resources staff will verify the authenticity of the certificate, record sight of the original certificate on the umbrella body confirmation of the DBS details and return the original to the applicant.

Christ's Hospital can access the DBS update service to carry out status checks on an individual's DBS Certificate. Providing the applicant has subscribed to the update service and meets the criteria specified by the DBS, Christ's Hospital may be able to discharge its responsibilities for undertaking a criminal records check by using the status update service. Christ's Hospital will still need to record sight of and verify the authenticity of the DBS certificate.

- 4.6.2 An enhanced DBS disclosure will contain details of all convictions on record including current and spent convictions (including those which are defined as "spent" under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. If the individual is applying for a position in Regulated Activity the enhanced disclosure with barring check will also reveal whether they are barred from working with these vulnerable groups by virtue of inclusion on the lists of those considered unsuitable to work with vulnerable groups maintained by the DBS. It may also contain non-conviction information from local police records which a chief police officer thinks may be relevant in connection with the matter in question.
- 4.6.3 Provided the check raises no concerns, all applicants using the Update Service and with a portable DBS certificate will have the details checked and verified online, however they may be subject to a new enhanced DBS check. This procedure will be undertaken in line with current DBS guidance.
- 4.6.4 Where the Update Service is used to check an Enhanced DBS Disclosure, an up-to-date barring check will also be undertaken.
- 4.6.5 In the event of an enhanced disclosure with barring check not being received in advance of a member of staff commencing work in Regulated Activity, a separate barring list check must be undertaken before the individual starts work.
- 4.6.6 If a criminal record Disclosure Certificate is received that contains a disclosure and is unsatisfactory, a thorough documented risk assessment will be carried out and a meeting held with the individual. For all academic appointments, this meeting will be with the Deputy Head. For support and CHEL roles, with the Chief Operating Officer (or nominated appropriate representative) in conjunction with the People and Culture Director. The Deputy Head or Chief Operating Officer, supported by the People and Culture Director, will make the decision whether to appoint the individual or not, based on the information disclosed at application stage and on the risk assessment. The outcome of any meeting will be placed on the individual's file.
- 4.6.7 For applicants who are living overseas, or who have lived overseas previously, obtaining a DBS certificate may be insufficient to establish their suitability to work at Christ's

Hospital. In such cases the applicant will be required to provide additional information about their suitability from the country (or countries) in which they have lived. Christ's Hospital's policy is to request such information from each overseas country in which the applicant has lived for a period of three months or more in the previous five years. When requesting such information Christ's Hospital has regard to relevant government guidance and will therefore always require the applicant to apply for a formal check from the country in question i.e. a criminal records check (or equivalent) or a certificate of good conduct.

Christ's Hospital recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances Christ's Hospital will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country.

In addition, where an applicant for a teaching position has worked as a teacher outside of the UK in mainstream schools, Christ's Hospital will ask the applicant to obtain from the professional regulating authority of the teaching profession in each country in which they have worked as a teacher evidence which confirms that they have not imposed any sanctions or restrictions on the applicant and that they are not aware of any reason why the applicant may be unsuitable to work as a teacher. Christ's Hospital will also ask shortlisted applicants to disclose whether they have ever been referred to, or are the subject of a sanction issued by, the regulator of the teaching profession in the countries in which they have carried out teaching work.

Sanctions and restrictions issued by the regulating authority of another country will not prevent a person from working as a teacher at Christ's Hospital. However, Christ's Hospital will take all relevant information into account in determining whether an applicant is suitable to work at Christ's Hospital.

Christ's Hospital may allow an applicant to commence work pending receipt of a formal check from a particular country if it has received a reference and/or letter of professional standing from that country and considers the applicant suitable to start work. Decisions on suitability will be based on all of the information that has been obtained during the recruitment process. Unless expressly waived by Christ's Hospital, continued employment will remain conditional upon Christ's Hospital being provided with the outcome of the formal check and it being considered satisfactory.

If no information is available from a particular country, Christ's Hospital may allow an applicant to commence work if they are considered suitable based upon the evidence of attempts to obtain confirmation and any other relevant information that has been obtained during the recruitment process.

Christ's Hospital will take proportionate risk-based decisions on a person's suitability in these circumstances. All suitability assessments must be documented and retained on file

If the formal check is delayed and Christ's Hospital is not satisfied about the applicant's suitability in the absence of that information, the applicant's proposed start date may be delayed until the formal check is received.

4.7 Starting work pending receipt of the DBS disclosure

- 4.7.1 If there is a delay in receiving a DBS disclosure and there will be a significant detriment to Christ's Hospital if the individual is unable to start work, subject to the consent of the Deputy Head for all academic appointments, and the Chief Operating Officer for support and CHEL roles, a staff member may start work pending the checking and verification of the DBS Enhanced Disclosure and providing that all other vetting checks have been completed and are satisfactory, including the barring check. The employee may start work on the strict understanding that they do not have unsupervised access to children. To ensure this, staff must either follow the Buddy Process (Appendix F) OR a risk assessment must be carried out. All staff who have not received their DBS disclosure must be adequately supervised during this time. A "Supervision Record" must be completed by the line manager detailing how the new staff member will be supervised during this time and by whom, authorised by a member of SLT and returned to HR for the personal file. Arrangements must be reviewed and documented every two weeks. This documentation must be submitted to HR to note on the Single Central Register.
- 4.7.2 Once the DBS disclosure has been checked by the HR department, HR will inform the line manager and relevant SLT members. HR will record the information on the Single Central Register.

4.8 Medical assessment

- 4.8.1 In order to assess an individual's medical fitness to undertake the role they have been offered; all prospective employees are required to complete Christ's Hospital's occupational health advisor's pre-employment medical questionnaire. Further assessment (telephone call or face to face appointment) by an occupational health doctor or nurse may be needed, depending on the information provided on the questionnaire, before the candidate is deemed medically fit to perform the role.

For some positions, such as volunteers and contractors who engage in regulated activity, Christ's Hospital may determine that successful applicants will instead sign a declaration of medical fitness confirming that there are no reasons, on mental or physical health grounds, why they cannot discharge the responsibilities required by the role. If an applicant prefers to discuss this with Christ's Hospital or to attend an occupational health assessment to consider their fitness for the role, they should contact a member of the HR team so that appropriate arrangements can be made.

4.9 Role specific requirements

- 4.9.1 Some roles may have specific requirements upon which an offer of employment is conditional. For example, teaching staff will be expected to provide evidence of relevant subject and teaching qualifications, and nursing staff will be expected to provide evidence of qualifications and NMC registration. Details of any specific requirements will be established at the start of the recruitment process including whether the individual is subject to a prohibition, sanction or restriction imposed by the DfE, or authorised agent or any EU/EEA equivalent restriction. Roles that may be

relevant are teaching roles and those involved with early years provision.

4.10 Probationary period

4.10.1 All new employees at Christ's Hospital will be subject to a probationary period. Length of probation will vary according to the role. All probationary periods will be reviewed periodically by the line manager. Confirmation of whether a probationary period has been successfully passed will be put in writing.

4.11 Previous employment history

4.11.1 All applicants will need to provide a full employment and education history from the date of the end of their full-time education to the date of their application. Any gaps for whatever reason (e.g., maternity leave, unemployment, imprisonment, etc.) must be fully accounted for. Any history that is contradictory or incomplete will be followed up and a record made of the outcome.

4.12 Early years - disqualification by association

4.12.1 All employees engaged in early years education will need to complete a declaration on appointment and in each subsequent year confirming that they are not disqualified by association from working in early years provision.

4.13 Single Central Register

4.13.1 Christ's Hospital will maintain a Single Central Register (SCR) of employment checks in line with regulatory requirements.

4.14 Online search checks

4.14.1 Keeping Children Safe in Education states that schools should "consider carrying out an online search as part of their due diligence on the shortlisted candidates". This process will be carried out by a suitable member of staff not directly involved in the recruitment process during shortlisting or after an offer of employment has been made (but prior to work commencing). Christ's Hospital will not carry out online searches as part of its initial sift of applications. For successful candidates, Christ's Hospital will retain information generated through online searches for the duration of the individual's employment and after employment ends in accordance with its Recruitment Records Retention Policy.

5. Recruitment of ex-offenders

5.1 Christ's Hospital will not unfairly discriminate against any applicant for employment based on conviction or other details revealed. Christ's Hospital makes appointment decisions based on merit and ability. If an applicant has a criminal record this will not automatically debar them from employment within Christ's Hospital. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

5.2 In view of the fact that all staff positions within Christ's Hospital perform "Regulated Activity" as defined by the Protection of Freedoms Act 2012, and were previously considered to be "regulated positions" within the meaning of the Protection of Children Act 1999, as amended by the Criminal Justice and Courts Services Act 2000, all applicants for employment must declare all previous convictions (including those which would normally be considered "spent" under the Rehabilitation of Offenders Act 1974). A failure to disclose a previous conviction may lead to an application being rejected or, if the failure is discovered after employment has started, this may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence depending on the nature of the conviction (see 5.3 and 5.4).

5.3 Under the relevant legislation, it is unlawful for Christ's Hospital to employ anyone who is barred from working with children. In addition, it will also be unlawful for Christ's Hospital 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 sexual offences, grievous bodily harm or other acts of violence.

5.4 It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within Christ's Hospital. If Christ's Hospital:

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

it will report the matter to the police, the DBS and any other relevant authorities.

5.5 It is Christ's Hospital'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 sexual offences, grievous bodily harm or other acts of violence;
- class A drug related offences, robbery, burglary, theft, deception or fraud;
- drink driving within the ten years previous to the application.

6. Volunteers

6.1 Line managers wishing to engage the services of a volunteer should speak to HR before starting any activity to recruit the volunteer.

6.2 Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in Regulated Activity.

6.3 For new volunteers in Regulated Activity who will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis Christ's Hospital will obtain an enhanced DBS certificate with barred list check. In addition, depending

on the nature of the role, Christ's Hospital will risk assess and consider what additional checks may be required. As well as considering which, if any, elements of the full battery of recruitment and vetting checks that are completed for employees should apply, Christ's Hospital will consider any contrary indications from the Christ's Hospital community as to the individual's suitability.

- 6.4 For new volunteers not in Regulated Activity, Christ's Hospital will obtain an enhanced DBS certificate.
- 6.5 If a volunteer is not engaging in Regulated Activity, in addition to obtaining an enhanced DBS Certificate, Christ's Hospital will undertake a documented risk assessment and use professional judgement and experience to decide what other checks to undertake to be assured of the suitability and competence of the individual. The checks may include references; an informal interview; and checking with the Christ's Hospital community for any concerns. In deciding what checks are required Christ's Hospital will consider:
- the nature of the work with children;
 - what Christ's Hospital knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers; and
 - whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability.

For existing volunteers not in Regulated Activity there is **no requirement** to request an enhanced DBS check. However, Christ's Hospital may choose to request one as it judges necessary but may not request a check of the barred list.

- 6.6 The Protection of Freedoms Act 2012 amended the Safeguarding Vulnerable Groups Act 2006, removing supervised volunteers from Regulated Activity. The Secretary of State issued guidance to assist in deciding what level of supervision is required so that this exclusion would apply. If the volunteer is to be supervised while undertaking an activity which would be Regulated Activity if it was unsupervised, the statutory guidance must be followed. See Appendix G. The guidance issued following this change requires that:
- there must be supervision by a person who is in Regulated Activity;
 - the supervision must be regular and day to day; and
 - the supervision must be "reasonable in all the circumstances to ensure the protection of children".
- 6.7 Christ's Hospital is not legally allowed to request a barred list check on a volunteer who, because they are supervised, is not in Regulated Activity.
- 6.8 'One-off' volunteers, for day outings, school concerts and so on would not require vetting checks, but they should not be unsupervised or undertaking any kind of personal care.
- 6.9 Existing volunteers should have been checked as required at the time of appointment.

Christ's Hospital will consider obtaining a new check if there are concerns.

- 6.10 Regular visiting speakers would be subject to the same vetting regime as volunteers. Non-regular visiting speakers are subject to the Visiting Speakers Policy contained in the Visitors Access Policy – see section 12.
- 6.11 Christ's Hospital will maintain a record of the vetting checks conducted on the volunteer.

7. School governors - members of the Council of Christ's Hospital

- 7.1 Members of the Council of Christ's Hospital (the Council; Council Members) are volunteers and are treated on the same basis as other volunteers, that is, an enhanced DBS check with barred list check should only be requested if they will be engaged in Regulated Activity. Christ's Hospital can request an enhanced DBS check without a barred list check on an individual as part of the appointment process. As a rule, members of the Council of Christ's Hospital are often seen as in a position of authority/trust, are not subject to robust supervision and consequently an enhanced DBS with barred list check will be obtained.
- 7.2 The Chair of the Council (the Treasurer) is deemed by the Independent Schools Inspectorate to be the Proprietor of Christ's Hospital. As a result, on appointment, the individual will be subject to further vetting checks by the Secretary of State, as set out in the Registration of Independent Schools Information Pack.
- 7.3 As these individuals are involved with the management of Christ's Hospital, their appointment is conditional upon receipt of a satisfactory check confirming that the individual is not subject to a prohibition order issued by the Secretary of State.
- 7.4 Further checks as Christ's Hospital considers appropriate should be undertaken where, by reason of the individuals living or having lived overseas for more than three months in the past five years, obtaining an enhanced DBS check is not sufficient to establish their suitability to work in Christ's Hospital. See 4.6.7
- 7.5 As part of their appointment procedure, Christ's Hospital will confirm the individual's identity and their right to work in the UK.
- 7.6 The Charities Act 2011 makes it a criminal offence for a person to act as a trustee or senior manager of a charity when disqualified from doing so. The Act sets out the grounds on which a person can be disqualified from acting as a trustee or senior manager. These include various spent and unspent criminal offences and other sanctions.
 - 7.6.1 A person is a charity trustee if they are one of the people who have general control and management of the administration of the charity. In an independent school the trustees will typically be the governors of the school

Senior managers include those employees who report directly to the charity

trustees or have responsibility for the overall management and control of the charity's finances. At Christ's Hospital the disqualification rules will be applicable to all members of Council, the Head/CEO, Chief Operating Officer and potentially other senior staff who report directly to the governors.

- 7.6.2 All those who are covered by the disqualification rules are required to complete a self-declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria.

A failure to disclose relevant information, or the provision of false information, which subsequently comes to Christ's Hospital's attention, may result in the termination of the appointment or the withdrawal of an offer of employment and may also amount to a criminal offence.

All those who are required to complete a self-declaration form are also under an ongoing duty to inform Christ's Hospital if there is a change in their circumstances that results or may result in them becoming disqualified from acting as a governor or senior manager.

- 7.6.3 To ensure that it has accurate and up-to-date information Christ's Hospital will also check the following registers in respect of each governor and senior manager who is already in post or is appointed in future:

- (a) the Insolvency Register;
- (b) the register of disqualified directors maintained by Companies House; and
- (c) and the register of persons who have been removed as a charity trustee.

- 7.6.4 A person who discloses that one or more of the disqualification criteria is applicable to them may apply to the Charity Commission for a waiver of the disqualification.

Christ's Hospital may at its absolute discretion withdraw an offer of employment for a senior manager or cease or terminate an appointment to the governing body if a waiver application becomes necessary or is rejected by the Charity Commission. Christ's Hospital is under no obligation to await the outcome of a Charity Commission waiver application before taking such action.

8. Presentation Governors and Blue Fund representatives

- 8.1 The nature of the role of Presentation/Donation Governor or Blue Fund Governor is that of a volunteer that allows for limited unsupervised access to pupils. As a consequence, the role is considered to be Regulated Activity and an enhanced disclosure with barring check is required.
- 8.2 Under the terms of the Blue Fund, only the elected Blue Fund Governor is allowed access to the pupil they are supporting.
- 8.3 For further information, please refer to 'A Guide for Donation Governors'

9. Contractors

- 9.1 Contractors who are working at Christ's Hospital on a long-term basis (Lodestone House, CTS, et al.) and are considered to be 'adopted contractors' will be subject to the same checks as all other staff (see section 3 above), with written confirmation supplied by the employing organisation. On successful completion of these checks, adopted contractor staff will have unsupervised access to children matching that of Christ's Hospital staff.
- 9.2 Where it is possible that the employees of other contractors will have unsupervised contact with children, Christ's Hospital has arrangements in place to ensure that DBS checks are undertaken by the employing contractor. Before a new individual starts work, Christ's Hospital should receive confirmation from the employing contractor that the required checks have been undertaken and make a check of photographic identification on their initial arrival of the employee at the premises. Christ's Hospital will keep records of employing contractor confirmations, to be available for inspection as per safeguarding guidance requirements. If a contractor is unable to undertake the DBS check themselves, Christ's Hospital may help the contractor to undertake vetting checks to ensure the individual's suitability.
- 9.3 If the individual is involved with the management of Christ's Hospital, their appointment is conditional upon the receipt of a satisfactory check confirming that the individual is not subject to a prohibition order issued by the Secretary of State.
- 9.4 Where contractors are self-employed and vetting checks are appropriate, Christ's Hospital may help the contractor to undertake vetting checks to ensure the individual's suitability.
- 9.5 Further details are contained in the Management of Contractors' Policy.

10. Employees of third parties (visiting professionals)

- 10.1 Individuals working at Christ's Hospital but employed by third parties (for example, psychologists, nurses, dentists, paramedic and other public sector staff) should have been checked by their employing organisation. It is not necessary for Christ's Hospital to seek their disclosure as appropriate checks should have been carried out and should be confirmed in writing by the organisation. Christ's Hospital will however want to check identity when an individual arrives to ensure imposters do not gain access to children.
- 10.2 The same rules apply to CCF instructors, sports referees and equivalent professionals supplied by a central body. Student teachers (unless employed by Christ's Hospital) will have been checked by the supplying university and so Christ's Hospital does not need to complete vetting checks, except for identity once confirmation of the university checks has been supplied to the HR department.

11. Agency staff

- 11.1 For each assignment undertaken by an individual agency employee, Christ's Hospital will check with the relevant agency that the required checks have been carried out: CV/application form, medical fitness declaration, disqualification from childcare (where appropriate), identity, enhanced disclosure, right to work in the UK, barred list check, qualifications, overseas checks.
- 11.2 In addition, on behalf of Christ's Hospital, the line manager will carry out an identity check before the agency employee begins working.
- 11.3 This information will be recorded on the Single Central Register. It will show that all these checks have been carried out.
- 11.4 Before the agency employee can begin an assignment, Christ's Hospital must have sight of the member of staff's original criminal records disclosure certificate. Provided the employee has been working continuously for the agency in a school or FE college in a role that brought them regularly into contact with children or young people during a period which ended not more than three months before they are due to begin work at Christ's Hospital, the certificates must be no older than three years old. If employment has not been continuous, a new certificate would be needed.
- 11.5 To demonstrate their compliance with KCSIE, the agency will provide Christ's Hospital with notification confirming that the agency has completed all the required pre-engagement recruitment checks. If the agency does not have a proforma for supplying this information, a template can be found in Appendix I

12 Visiting speakers

- 12.1 In all cases, the Christ's Hospital Visiting Speakers Policy will apply to individuals who are invited to speak to pupils.
- 12.2 Appropriate vetting checks will be conducted on all visiting speakers.
- 12.3 Where the visiting speaker is engaged in Regulated Activity, they will be subject to the necessary vetting checks. See Volunteers.

13. Retention and security of disclosure information

- 13.1 Christ's Hospital's policy on the retention and security of disclosure information is contained in a separate policy available on the staff intranet: Disclosure and Barring Service (DBS) - policy and procedure
- 13.2 Christ's Hospital complies with the provisions of the [DBS code of practice](#).

14. Retention of records

- 14.1 The data collected as part of the recruitment process will be confidential and will be

processed in accordance with the General Data Protection Regulations 2018 for the purposes of staff selection.

14.2 If an applicant is appointed, Christ's Hospital will retain any relevant information provided on their application form (together with any attachments) on their personal file in the HR department.

14.3 If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months unless the applicant specifically requests Christ's Hospital to keep their details on file.

15. Queries

15.1 If an applicant has any queries about completion of the application form or any other matter concerning recruitment and selection, then they should contact the HR Department.

16. Offer stage

16.1 Offers of employment can only be made by the HR Department or:

- for academic appointments, the Head & CEO/Deputy Head;
- for support appointments, the Chief Operating Officer, or their direct reports;
- for CHEL appointments, the CHEL Manager;

16.2 Offers of employment should be conditional offers, subject to the satisfactory completion of all pre-employment checks and references. All written offers will be drafted by the HR department and academic appointments will be signed off by the Head/CEO.

16.3 Start date

16.3.1 A confirmed start date must not be agreed if any of the following are outstanding:

- confirmation of right to work in the UK
- provision of sufficient evidence of identity to satisfy the requirement of the DBS
- receipt of references;
- receipt of medical clearance;
- unaccounted gaps in the applicant's employment history
- any other outstanding paperwork that Christ's Hospital requires before employment can commence – e.g., evidence of qualifications

16.3.2 All new recruits will receive an appointment letter and terms and conditions of employment. Terms and conditions will vary depending on the nature of the role.

16.4 Induction

16.4.1 All newly appointed staff and volunteers will be subject to an induction process that

includes the following:

- mandatory attendance at safeguarding training
- successful completion of Introduction to Health and Safety training and Prevent training
- receipt of Christ's Hospital policies in relation to safeguarding and promoting the welfare of children and Staff Code of Conduct:
- Christ's Hospital standards of conduct and behaviour communicated by the relevant line manager within the first week of employment;
- provision of a copy of Part 1 of the most recent Keeping Children Safe in Education guidance.

16.5 Any failure to follow the safer recruitment process may result in disciplinary action being taken.

17. Document reference guide:

- Independent Schools Inspection (ISI) – Framework (September 2025)
- Boarding Schools – National Minimum Standards (revised September 2022) - Standard 14:- Staff Recruitment and checks on other Adults – The NMS
- The Independent Schools Standards and Regulations (revised April 2019) – Part 3, paras 7 and 8 (Safeguarding) and Part 4 (Suitability of staff, supply staff and proprietors) – the ISSR
- Safeguarding Children and Safer Recruitment in Education. Every Child Matters published November 2006
- Keeping Children Safe in Education - Statutory Guidance for Schools and Colleges – September 2025
- DBS Guidelines and Code of Practice

Version Control

Version	Date	Author/Reviewer	Changes	Next Review Date
Ver 4.8	Aug 2019	Liz Heyburn	Minor updates to nomenclature and other language and to reflect changes to statutory guidance	Dec 2022
Ver 4.9	Aug 2020	Liz Heyburn	Updated to reflect publication of new KCSIE documentation	Aug 2023
Ver 4.10	Jan 2022	Liz Heyburn	Updated to reflect publication of new KCSIE documentation and other changes to statutory guidance.	Aug 2023
Ver 4.11	December 2022	Liz Heyburn	Updated to reflect changes in KCSIE 2022.	Aug 2024
Ver 4.12	August 2024	Liz Heyburn	Updated to reflect publication of new KCSIE and Prevent Duty guidelines	August 2025
4.13	August 2025	Liz Heyburn	Updated to reflect issue of KCSIE 2025 & change to nomenclature	August 2026
4.14	January 2026	Judy Smith	Minor updates including updating the oversees checks procedure.	January 2027

Appendices

Please see [Departments\Human Resources\Employment Policies and Procedures\Safer Recruitment Policy and Recruitment and Selection Procedure](#) on the staff intranet

Appendix A

Recruitment Request Form

Appendix B

Recruitment Process

Appendix C

Recruitment Process Supporting Notes and Checklist

Appendix D

Roles that the organisation considers are within the criteria of "Management of Independent Schools" as defined by the DfE:

- All members of Christ's Hospital's Senior Leadership Team and Senior Strategy Team
- CHEL – CHEL Manager
- Council Members

Appendix E

- Guidance on acceptable documents confirming right to work in the UK
<https://www.gov.uk/government/publications/illegal-working-penalties-codes-of-practice-for-employers>
- Documents the applicant must provide in order for the DBS check to be made
<https://www.gov.uk/disclosure-barring-service-check/documents-the-applicant-must-provide->

Appendix F

Buddy process

Appendix G

Statutory guidance

Appendix H

Vetting checks on volunteers

Appendix I

Letter of Assurance

Appendix J

Details of staff involved in recruitment process