
Safer Recruitment Policy

Introduction

This policy outlines our commitment to safeguarding and promoting the welfare of children by ensuring we have implemented procedures designed to prevent unsuitable people working with our pupils.

These procedures are designed to comply with the guidance given by The Wales Safeguarding Procedures, Keeping Learners Safe (2022) Welsh Government, and form an element of the School's Safeguarding Policy to which reference should also be made.

Aims:

- to ensure that the best possible staff are recruited based on their merits, abilities, and suitability for the position.
- to ensure that all job applicants are considered equally and consistently.
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, gender, or sexual orientation, marital or civil partner status, disability, or age.
- to ensure compliance with all relevant legislation, recommendations and guidance including the Welsh Government statutory guidance Keeping Learners Safe (March 2022), the Prevent Duty Guidance for England, and Wales (2023) and any guidance or code of practice published by 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.

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

Roles and responsibilities:

It is the responsibility of the Directors to:

- Ensure the School has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with Welsh Government guidance and legal requirements.
- Monitor the School's compliance with them.

It is the responsibility of the Headteacher to:

- Ensure that the school operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the school. To ensure this, at least 1 person will have completed Safer Recruitment Training.
- Monitor contractors' and agencies' compliance with these safer recruitment procedures.
- Promote the welfare of children and young people at every stage of the recruitment process.

Recruitment and selection procedure:

Advertising;

- The Directors will decide on the most appropriate process for advertising posts.
- Any advertisement will make clear the school's commitment to safeguarding and promoting the welfare of children.
- All documentation relating to applicants will be treated confidentially in accordance with GDPR.
- Applicants will be required to provide information on:
 - academic qualifications
 - full employment history
 - any convictions
 - suitability to work with children.
 - CV
- The Safeguarding Policy will be sent out along with all other documentation relating to the post.
- It is unlawful for the school to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the school. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.
- Job Descriptions and Person Specifications
 - A job description will clearly and accurately set out the duties and responsibilities of the job role.
 - The person specification will detail the
 - skills,
 - experience,
 - abilities,
 - expertise required to do the job.
- References may be sent for prior to interview unless the applicant has expressly indicated on their application form that they do not wish their current employer to be contacted at that stage.
- All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory. **One of the references must be from the applicant's current or most recent employer.** If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with

children if possible. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions.

- All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism".
- No questions will be asked about health or medical fitness prior to any offer of employment being made.
- Any discrepancies or anomalies will be followed up. Direct contact by phone will be undertaken with each referee to verify the reference.
- The school does not accept open references, testimonials, or references from relatives.
- Interviews
 - There will always be a face-to-face interview and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the school to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).
 - Applicants will complete a declaration form, prior to a DBS check being carried out, if there is anything they wish to notify the recruiting panel of in advance of the checks being made.

Offer of appointment and new employee process

An offer of employment will be conditional on the following:

- a mutually acceptable start date
- signing of a contract incorporating the school's terms and conditions of employment.
- verification of the applicant's identity.
- the receipt of two references (one of which must be from the applicant's most recent employer) which the school considers to be satisfactory.
- confirmation that the applicant is not named on the Children's Barred List.
- confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies, or restricts them from providing education at a school, taking part in the management of an independent school, or working in a position which involves regular contact with children.
- Education and Workforce Council (EWC) pre-employment checks and registration
- verification of the applicant's medical fitness for the role.
- verification of the applicant's right to work in the UK.
- any further checks because of the applicant having lived or worked outside of the UK;
- a personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The checklist will be retained on personal files.
- all appointments are subject to a probationary period

- the school's disciplinary and capability procedures do not apply during this probationary period. The school also reserves the right to extend this probationary period should it deem this necessary.

DBS (Disclosure and Barring Service) Certificate (See appendix 1)

The school applies for an enhanced disclosure from the DBS and a check of the Children's Barred List in respect of all positions at the school which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information.

Staff are informed of the opportunity to join the DBS Update Service or they renew their DBS every 3 years.

If employment commences before the DBS certificate is verified, this may take place provided all other recruitment checks have been satisfactorily completed, a risk assessment is carried out, and the new employee is always kept under supervision whilst on site.

Dealing with convictions

- The Company will not unfairly discriminate against any applicant for employment based on conviction or other details disclosed.

A formal procedure is in place if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and:

- the nature, seriousness, and relevance of the offence of how long ago the offence occurred
- one-off or history of offences
- changes in circumstances
- decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Directors. A decision will be made following this meeting.

- 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 Directors will evaluate all of the risk factors above before a position is offered or confirmed.
- If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the school may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information

Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status.

All applicants invited to attend an interview at the school will be required to bring their identification documentation such as passport or birth certificate with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006.

Medical Fitness

- The school is legally required to verify the medical fitness of anyone to be appointed to a post at the school, after an offer of employment has been made.
- All applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required. This information will be reviewed against the Job Description and the Person Specification for the role, together with details of any other physical or mental requirements of the role
- The school is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence, considering reasonable adjustments and suitable alternative employment.

Overseas checks

In addition, applicants who have lived/travelled abroad for more than 3 months we will need to obtain criminal records check from the relevant country.

Induction Programme

All new employees will be given an induction programme which will clearly identify the school policies and procedures, including the Safeguarding Policy, the Employee Handbook which make clear the expectations which will govern how staff carry out their roles and responsibilities.

Single Central Record (SCR)

All members of staff in addition to the various staff records kept in School and on individual personnel files, a single central record of recruitment and vetting checks (known as the "SCR") is kept in accordance with the Keeping Learners Safe (2022) Welsh Government requirements. This is kept up-to-date and retained by the HR Manager. The SCR will contain details of the following:

- all employees
- all staff of contractors
- volunteers

Record Retention / GDPR

- The school is legally required to undertake the above pre-employment checks. The school will retain copies of documents used to verify;
 - identity,
 - right to work in the UK,
 - medical fitness. 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.
 - qualifications.
 - CV
 - Application form
 - EWC
- Documentation will be retained by the school for the duration of the applicant's employment with the school. All information retained on employees is kept centrally in office in a locked and secure cabinet.
- In accordance with GDPR, the School will retain the recruitment documentation on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed.
- Agencies/Universities who supply staff/students to the school must also complete the pre- employment checks. The School will confirm that these checks have been completed before an individual can commence work at the school.
- Contractors who come on site only to carry out emergency repairs or service equipment and who are not expected to be left unsupervised on the school's premises do not need a DBS Disclosure.

Visiting Speakers

- Visiting speakers are suitably and appropriately supervised.
- All visiting speakers will sign in and out at Reception. They will wear a visitors' badge at all times.
- The school does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex, or sexual orientation, marital or civil partner status, disability, or age.

Volunteers

- The school will request the following checks on all volunteers who are involved on a regular basis:
 - Identity checks
 - Enhanced DBS Disclosure
 - Barred List check
 - Qualifications, if applicable
 - References
 - Appropriate Risk Assessments and/or additional supervision will be planned to ensure safety as necessary.
 - Volunteers or parents who accompany staff on one-off outings or trips and do not have unsupervised access to children will not need to be vetted.

Monitoring and Evaluation

The Headteacher will be responsible for ensuring that this policy is monitored and evaluated throughout the school.

Linked documents and policies

- Keeping Learners Safe 272/2022
- Education Act 2002
- Barring certificate and that application has been countersigned by the National Assembly for the purposes of Part V of the Police Act 1997
- a disclosure and barring certificate under section 113A of the Police Act 1997
- Independent Schools (Provision of Information) (Wales) Regulations 2003
- Safeguarding Policy
- Health and Safety Policy
- Equality and Diversity Policy

Appendix 1

DBS Process

