



Safer Recruitment Policy Statement

Date: October 2022
Review Cycle: Annually
Next Review Date: October 2023
Owner: Bursar

Bredon School is owned and operated by Cavendish Education; the Proprietary Body also known as the Governing Body. Any reference to Governor's means any Director of Cavendish Education.

This Policy document is one of a series of Bredon Policies that, taken together, are designed to form a comprehensive, formal Statement of Bredon's aspiration to provide an outstanding education for each and every one of its students and of the mechanisms and procedures in place to achieve this. Accordingly, this Policy needs to be read alongside all of these Policies in order to get the full picture; in particular it should be read in conjunction with the ***Safeguarding Children Policy***.

All of these Policies have been written, not simply to meet statutory and other requirements, but to evidence the work that the whole School is undertaking to ensure the implementation of its core values:

'To be a small, family school that genuinely focuses on the individual; ensuring each pupil reaches his or her personal potential and destination by way of a rich and diverse journey based on breadth of opportunity, support and continuously striving towards excellence.'

In all Bredon Policies, unless the specific context requires otherwise, the word "parent" imports the meaning parent, guardian, carer or any person in whom is vested the legal duties and responsibilities of a child's primary caregiver.

Bredon employs the services of the following consulting companies to ensure compliance is met and the best practice is implemented:

Peninsula HR Online
Peninsula Business Safe (Health and Safety)
Atlantic Data (DBS)
Educare (online CPD)

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in education. Bredon School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Bredon School is also committed to providing a supportive and flexible working environment to all its members of staff. Bredon School recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment. It is recognised that this can only be achieved through sound procedures, good inter agency cooperation and the recruitment and retention of competent, motivated employees who are suited to, and fulfilled in the roles they undertake.

Bredon School recognises the value of, and seeks to achieve a diverse workforce which includes people from different backgrounds, with different skills and abilities. Bredon School is committed to ensuring that the recruitment and selection of all who work within the school is conducted in a manner that is systematic, efficient, effective and promotes equality of opportunity. Bredon School will uphold its obligations under law and national collective agreements to not discriminate against applicants for employment on the grounds of age, sex, sexual orientation, marital status, disability, race, colour, nationality, ethnic origin, religion or creed.

The aims of Bredon School's recruitment policy are:

- To ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
 - 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* September 2022(KCSIE), *Working Together to Safeguard Children* March 2015, *Every Child Matters*, *The Independent School Standards Guidance for Independent Schools* April 2019 and any advice published by the Disclosure and Barring Service (DBS); ISI Regulations September 2015 Part 4; DFE Letter August 2015 'Appointments'.
 - 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.

All positions within Bredon School are exempt from the Rehabilitation of Offenders Act 1974 and therefore all applicants will be required to declare spent and unspent convictions, cautions and bind-overs, including those regarded as spent and have an Enhanced Disclosure & Barring Service Check.

Bredon School is committed to ensuring that people who have been convicted are treated fairly and given every opportunity to establish their suitability for positions. Having a criminal record will not necessarily be a bar to obtaining a position. This will

depend on the background, nature and circumstances of the offence(s).

Bredon School will make all reasonable adjustments to enable disabled members of staff to carry out their duties effectively.

Pre-employment checks

In accordance with the recommendations set out in the Guidance, and the requirements of the Education (Independent School Standards) (England) Regulations 2010 Bredon School carries out a number of pre-employment checks in respect of all prospective employees.

If it is decided to make an offer of employment following a formal interview, employment with Bredon School will be conditional on the following:

- completion of Bredon School Application Form, with satisfactory records for reasons for any gaps in employment;
- verification of the applicant's identity in line with the requirements of The Immigration, Asylum and Nationality Act 2006;
- production of evidence of the right to work in the UK (for any member of staff who is not a national of a European Economic Area (EEA) country);
- receipt of at least two references which are satisfactory to Bredon School, one of which will be from the applicant's most recent employer. If a verbal reference is taken, detailed notes will be taken, dated and signed. Applicants will be informed that any previous employer may be contacted. All references will be verified by phone;
- confirmation that the applicant is not barred from working with children [and / or vulnerable adults];
- confirmation that the applicant is not subject to a prohibition order issued by the Secretary of State.
- the receipt of an enhanced disclosure from the DBS which Bredon School considers to be satisfactory. Number, date and name of person who completed check to be recorded; verification of the applicant's medical fitness; • verification of the applicant's qualifications;
- confirmation that the applicant is registered with the appropriate professional or regulatory body as required from time to time;
- obtain a Certificate of Good Conduct for applicants who were born or have worked abroad where the applicant has not worked in a School in the UK since moving from overseas;
 - declaration from the applicant that they have read and understood Part 1 of the DFE statutory guidance KCSIE
 - interview, with written record of outcome (in line with NSPCC Safer Recruitment in Education training)
 - the school considers the applicant is suitable for the position

The enhanced disclosure application shall be completed in advance, prior to the member of staff commencing employment. Where there is a delay in the enhanced disclosure certificate being issued the Headmaster may allow that member of staff to commence employment, without confirming the appointment, but only where all other checks have been satisfactorily completed including a barred list check. A Risk Assessment shall be undertaken ensuring appropriate safeguards are put in place

including ensuring the member of staff is supervised. The member of staff shall be informed of these safeguards, which shall be reviewed every two weeks. Comments shall be added to the Single Central Register of recruitment vetting checks (SCR) and evidence kept of the safeguarding measures put in place.

Where members of staff are transferred under Tupe (where there is a gap of three months or less and where all information is complete) this information will be passed to the new employer and a note made on the SCR that details have been accepted under TUPE.

Roles and Responsibilities

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy. It is the responsibility of the Headmaster and other managers involved in the recruitment process to:

- ensure that the School operates safe recruitment procedures and carries out all appropriate checks on all staff and volunteers who work at the School;
- monitor contractors' and agencies' compliance with this policy; and
- promote the welfare of children and young people at every stage of the procedure.

It is the responsibility of all contractors and agencies that provide services to Bredon School to comply with safer recruitment practices. It is the responsibility of Bredon School, in conjunction with the Headmaster, to ensure all pre-employment checks are complete before employment begins. Identity of contract staff shall be verified on arrival at Bredon School by viewing an original photo identification document and obtaining a copy of the document.

Bredon School will ensure Recruitment Agencies have undertaken required checks for their supply staff to include identity, enhanced DBS (renewed every three years), right to work in the UK, Barred List check/List 99, prohibition from teaching, qualifications, overseas certificate of good conduct (if applicable) EEA Check, at least two references in line with KCSIE, declaration of medical fitness and checks of previous employment history.

Identity of supply staff shall be verified on arrival at Bredon School by viewing an original photo identification document and obtaining a copy of the document. In addition Bredon School will view the original enhanced DBS certificate and obtain a copy.

Verification of Identity and Address

All applicants who are invited to an interview will be required to bring the following evidence of identity, right to work in the UK, address and qualifications:

- passport, photo-card driving licence and original birth certificate;
- A utility bill no older than three months showing their name and current home address;
- where an applicant has moved addresses within the last five years proof of

- address for each property they have lived at;
- documentation confirming their National Insurance Number (P45, P60 or National Insurance Card);
- original documents confirming any educational and professional qualifications referred to in their application form;
- where an applicant claims to have changed his/her name by deed poll or any other means (e.g., marriage, adoption, statutory declaration) he/she will be required to provide documentary evidence of the change.

The Procedure

Advertising

To ensure equality of opportunity, Bredon School will advertise all vacant posts to encourage as wide a field of candidates as possible. Normally this will entail an external advertisement. However, where there is a reasonable expectation that there are sufficient qualified internal candidates or where staff are at risk of redundancy, an internal advertisement may be considered appropriate.

Applications

Applicants will receive a job description for the role applied for. All applicants for employment will be required to complete an Application Form containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. A curriculum vitae may be submitted together with an application form. Bredon School does not accept a curriculum vitae in place of an application form.

The applicant may then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail.

Bredon School requires applicants to account for any gaps or discrepancies in employment history on the application form. Where an applicant is shortlisted, any gaps will also be discussed at interview.

Applicants should be aware that providing false information is an offence and could result in an application being rejected or summary dismissal if the applicant has been selected. Where false information is provided in support of an application to work at Bredon School, the School is required to report the matter to the DBS, the police and other relevant professional bodies.

References

References for shortlisted applicants (to include the last employer the applicant worked for) will be requested immediately after short-listing. The only exception to this is where applicants have indicated on their application forms that they do not

wish their current employer to be contacted.

If the current/most recent employment does/did not involve work with children, then the second referee will be from the employer with whom the applicant most recently worked with children.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, position held, salary, reason for leaving, performance and disciplinary record;
- their relationship to the applicant;
- whether they have any reason to believe that the applicant is unsuitable to work with children;
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired);
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people.

Bredon School will only accept references obtained directly from the referee and will not rely on references or testimonials provided by the applicant or open references or testimonials. Bredon School will not accept references from relatives of the applicant or people writing solely in the capacity as a friend.

References will be compared to the application form to ensure that the information provided is consistent. Any discrepancies will be taken up with the applicant and/or the referee before any appointment can be confirmed. Any information about past disciplinary action or allegations will be considered in the circumstances of the individual case.

All referees shall be contacted by phone to confirm the authenticity of the reference. In the event of overseas candidates, the school will firstly seek verbal references by telephone/Skype which if successful will be supplemented by written references. A successful candidate will also undergo appropriate Police checks for their current Country before employment commences.

Any verbal references will be followed up with written references.

Medical Fitness

Bredon School is 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. If appropriate, the School will arrange for the information contained in the Medical Questionnaire to be reviewed by Bredon School's medical advisor. This information will be reviewed against the Job Description for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed timetable, extra-curricular activities, layout of the School etc. If the School's medical advisor has any doubts

about an applicant's fitness the School will consider reasonable adjustments in consultation with the applicant. The School may also seek a further medical opinion from a specialist or request that the applicant undertakes a full medical assessment.

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 and considering reasonable adjustments and suitable alternative employment.

Criminal Records Check

Due to the nature of the work, Bredon School applies for an enhanced disclosure from the DBS in respect of all prospective members of staff, governors and volunteers.

An enhanced disclosure will contain details of all convictions on record (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. An enhanced disclosure will also reveal whether an applicant is barred from working with children or vulnerable adults by virtue of his/her inclusion on the lists of those considered unsuitable to work with children or vulnerable adults maintained by the DBS. An enhanced disclosure 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.

If there is a delay in receiving a DBS disclosure the Headmaster has the discretion to allow an individual to begin work pending receipt of the disclosure. This will only be allowed if all other checks, including a check of the Children's Barred List and a Risk Assessment, have been completed and once appropriate supervision has been put in place.

DBS checks will be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants may also be asked to provide further information, including the equivalent of a DBS disclosure (Certificate of Good Conduct), from the relevant jurisdiction(s) together with appropriate Policy Checks if available.

Interviews

The selection process will include the following:

- a face to face professional interview including questions related to safeguarding children; and
- an activity with children, as appropriate

All recruitment will be undertaken with at least one member of the panel having undertaken Safer Recruitment Training.

Questions will be agreed in advance by the panel.

The panel will undertake a regular review of safer recruitment procedures.

Prohibition from Management of Independent Schools Check (Section 128 direction)

As in accordance with the ISI Regulations Part 4 section 242 (P53-54)

Bredon School will check whether staff appointed to management positions are subject to a Section 28 direction. Recognising that this would involve all appointments within the school considered to be a management position and not merely teaching staff.

Verification of Qualifications and/or Professional Status

Short-listed applicants will be required to provide proof of their qualifications and professional status by producing original documentation. Bredon School will verify that applicants have actually obtained any qualifications legally required or deemed essential for the job and claimed in their application by asking to see the relevant original certificate, or a letter of confirmation from the awarding body / institution. If the original documents are not available, the School will require sight of a properly certified copy. Where applicants have obtained qualifications abroad, a certified comparability check by NARIC will also be requested if there is any query over the qualification.

Contractors, Agency and Peripatetic Staff

Contractors engaged by Bredon 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 employees of the Contractor can commence work at the School.

Agencies who supply staff to Bredon School must also complete the pre employment checks which the School would otherwise complete for its staff.

Again, the School requires confirmation that these checks have been completed before an individual can commence work at the School.

Peripatetic staff will complete the same checks the School is required to take for all other staff.

The School will independently verify the identity of staff supplied by contractors or an agency.

Visiting Speakers In line with Prevent statutory guidance

Bredon School will ensure that any visiting speakers who might fall within the scope of the Prevent duty, whether invited by staff or pupils, are appropriately supervised.

Bredon School will, in line with regulation, also take action to ensure that each speaker is suitable.

Persons over 16 Living on School premises but not Employed by the School

All persons over the age of 16 not on the roll of the school but living on the same premises as Bredon School boarders will sign a declaration confirming that they agree:

- to be checked against the Child Workforce Barred List
- to a Disclosure and Barring Service check being undertaken for them. If they were born or have lived abroad it may also be necessary to obtain a Certificate of Good Conduct for them from the countries in which they have lived to abide by the Bredon School's Staff Code of Practice which provides guidance on contact with boarders
- to supervise their visitors whilst they are on school premises at all times and ensure that their your visitors abide by Bredon School's Staff Code of Practice
- to notify an unrelated designated senior member of staff if they are charged or convicted of any offence
- that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with children
- to complete a declaration that they have read and understood Part 1 of the DFE statutory guidance KCSIE
- as a condition of them occupying accommodation on Bredon School premises that they agree:
- that it does not imply that the School shall be obliged to provide them with housing accommodation
- That it does not imply, without the consent of the School, that you are permitted to allow any other person to occupy the accommodation
- to keep the accommodation and the fixtures and fittings therein clean, tidy and undamaged [fair wear and tear excepted] and maintain the garden in good order
- upon being required to vacate the accommodation, to deliver up possession of the accommodation and of the School's fixtures and fittings therein to the School

Policy on Recruitment of Ex-offenders

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

All positions within Bredon School are exempt from the provisions of the

Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions, including those which would normally be considered “spent”, when applying for a position at the School except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules. A failure to disclose a previous conviction may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, 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.

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 attempt to apply for a position at the School. The School will make a report to the Police and/or the DBS if:

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

All applicants for all jobs are required to complete an ex-offenders declaration Form.

All appointed staff are made aware during the induction Process of their obligation to inform the school of any cautions or convictions that arise subsequent to any checks.

Assessment Criteria

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, Bredon School will consider the following factors before reaching a recruitment decision:

- The extent to which 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, if relevant, the applicant’s circumstances have changed since the offending behaviour or other relevant matters;
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.
- Other relevant matters

If the post involves contact with children, it is the School’s normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:

- murder, manslaughter, rape, other serious sexual offences, grievous bodily

- harm or other serious acts of violence; or
- serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud. If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

Assessment procedure

Where an applicant discloses conviction(s) before interview, interviewers must seek to establish the facts during the interview and, if necessary or appropriate, arrange to investigate the matter further.

Where conviction(s) are not disclosed prior to interview, the candidate will either be i) discounted or ii) called to a further interview at which all relevant facts will be established. Subsequent to this, all of the risk factors must be formally evaluated before a decision is made to offer or confirm a position.

If (during or subsequent to the appointment process) a DBS Certificate reveals any convictions, the person concerned will be invited to attend an interview with the Head Teacher and HR Manager to discuss the conviction(s) and circumstances. Following this meeting a risk assessment will be carried out and a decision made and communicated to the person concerned. For safer recruitment purposes, until this decision has been made the applicant will not commence employment. The risk assessment may indicate that the school should not proceed or continue with the employment of the individual.

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 wholly at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information with the DBS.

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or is obtained through a disclosure check, the school will carry out a risk assessment (see below) by reference to the criteria set out above. The risk assessment form must be signed off by the Head Teacher before a position is offered or confirmed. The risk assessment form is to be permanently retained on the relevant staff file.

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, Bredon School will carry out a risk assessment by reference to the criteria set out above. Such convictions will also be discussed with the applicant at interview.

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.

Retention and security of DBS disclosure information

Bredon School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

In particular, the School will:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to member of the School's senior management team
- not retain disclosure information or any associated correspondence for longer than is necessary, but with due regard for safeguarding requirements to evidence the security of the school's procedures. 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.

Record Retention / Data Protection

If an applicant is appointed, the School will retain any relevant information provided on his/her application form, together with any attachments and evidence of the pre employment checks completed on his/her personnel file. If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after one year.

Single Central Register of Recruitment Vetting Checks (SCR)

In line with DFE requirements, Bredon School will keep and maintain a SCR. The SCR will list all staff who are employed at the School, including casual staff, supply agency staff whether employed directly or through an agency,

Volunteers, governors, and those who provide additional teaching or instruction for pupils but who are not employed by the School e.g. specialist sports coach.

The SCR will indicate whether the required pre-employment checks have been completed, what documents have been checked, when and by whom.

Date: October 2022

Author: Bursar

Review Cycle: Annually

Next Review Date: October 2023

Headmaster

Employee Name :				
Position:				
Start Date:				
Employment	Sent	Returned	Date	Comments
Job Description				
Application Form				
Interview notes/questions				
Reference 1- Received/Verified				
Reference 2- Received/Verified				
Gaps in Employment Checked				
Previous Employments working with children Checked				
ID Documents Check				
Qualification Check				
Offer Letter				
Medical Questionnaire				
Contract Issued and Signed				
Child Protection Documents				
Barred list				
Prohibition Check				
Risk Assessment- If Required				
Enhanced DBS Application Complete				
Enhanced DBS Form Seen By Employer				
DBS Certificate Number				
KCSiE Document Signed				
Payroll/Pensions				
HMRC Starter Checklist				
Bank Details Form				
Other Employment				
Staff Handbook Read and Signed				
Code of Conduct Issued & Signed				
IT Usage Documents Signed				
Emergency Contact Sheet				
Expression of Wish Form				
Equal Opportunities Monitoring				
Employee Assistance Program				
Service Occupancy Agreement				
Driving Check				