

Safeguarding – Safer Recruitment Policy and Procedures

1. Introduction

Knightsbridge School (**the School**) is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff. The 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. Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

2. Recruitment Policy

a. *Policy Aims:* The aims of this policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.
- to ensure compliance with all relevant legislation, recommendations and guidance including:
 - the statutory guidance published by the Department for Education (**DfE**),
 - Safeguarding children and safer recruitment in education (**Guidance**),
 - Keeping Children Safe in Education (KCSIE) September 2021
 - Disqualification under the Childcare Act 2006, published February 2015, (**DCA**),
 - *What to do if you are worried a child is being abused* (March 2015),
 - *Working together to safeguard children* (September 2018)
 - Prevent Duty Guidance for England and Wales (July 2015)
 - The Use of Social Media for Online Radicalisation (July 2015)
 - criteria set by the London Safeguarding Children's Board as adopted by the Bi-borough Safeguarding Board for the boroughs of Kensington & Chelsea and Westminster
 - and any guidance or code of practice published by the Disclosure and Barring Service (**DBS**)

b. *Scope, Availability and Monitoring of the Policy:* This policy applies to:

- the whole School including all activities provided by the School, including those outside normal school hours;
- all staff (teaching and support staff), pupils on placement, the proprietor and volunteers working in the School.

The policy is made available to:

- staff on the school website and TeachersRead in the Policy folder
- parents via the parent portal and the school website and on request a copy may be obtained from the School Office.

The policy will be reviewed and amended every year.

3. General Provisions

a. *Principal's Responsibilities:* The Principal ensures that:

- appropriate policies and procedures are adopted to safeguard children in the School;
- these policies are implemented and followed by all staff;
- sufficient resources and time are allocated for staff to carry out their responsibilities effectively;

b. *Leadership Responsibilities:* The Head and the Bursar for the teaching/ classroom staff and for the support staff ensure all of the following, that:

- all those working in the School are suitable people;
- all staff and adult helpers in the School are able to voice their concern if they feel that a child is vulnerable, or that there are any particular practices that are unsafe
- staff undergo relevant, regular training and supervision to maintain up to date in issues of safeguarding.

c. *Safer recruitment training:* The Strategic Leadership Team (SLT) and Senior Management Team (SMT) as appropriate have completed a Safer Recruitment in Education course and receive further regular training to raise their awareness and to improve their knowledge of safer recruitment as required by legislation and also agreed locally. Any requirement to update training will be assessed yearly. Other staff members involved in recruiting may also be offered the opportunity to complete a Safer Recruitment in Education course.

d. *Equal Opportunities:* The School does not discriminate between candidates on the basis of any protected characteristic including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age. Knightsbridge School is mindful of the requirements relating to the recruitment of ex-offenders as set out above.

e. *Referrals to DBS:* This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks the School also has a legal duty to make a referral to the DBS in circumstances where an individual:-

- has applied for a position at the School despite being barred from working with children; and/or
- has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

As from October 2014, if the individual referred to the DBS is a teacher, the School must make a referral to the DfE as well.

- f. *Post Employment vigilance:* Any disclosure of sexual, emotional, physical abuse or neglect made by a child in relation to a staff member will be thoroughly investigated in accordance with our Child Protection procedures and the Government guidance "Dealing with allegations of abuse against teachers and other staff".

During the first few weeks of work the Line Manager of a new employee will endeavour to provide such supervision as is reasonable in the circumstances. Teachers will be asked to visit the classroom or area of the new employee as part of their normal discharge of duties around the School. Senior members of staff will pay *ad hoc* courtesy visits to the classroom or workspace of the new employee. In addition, it is likely that teachers, technicians or teaching & learning assistants (TLAs) or other members of staff will already be deployed in some of the areas where new employees are working. It is vitally important that the above actions are carried out in the spirit of, and viewed as supportive mechanisms for, the new employee as much as a safeguarding procedure for children.

4. **Sourcing candidates**

- a. *Adverts:* The school generally recruits via advertising online and in appropriate publications. All adverts placed by the School feature the following safeguarding statement:

Knightsbridge School is totally committed to safeguarding the welfare of children and young people and expects the same from all its staff.

- b. *Recruitment Agencies:* Occasionally the school uses the services of a recruitment agency to source suitable candidates for permanent vacancies. Candidates submitted via this route are required to follow the school's full safer recruitment procedures and the school maintains full responsibility for the safer recruitment vetting of these candidates. (NB: for Supply Staff see refer to Para 10 i below)

- c. *Job descriptions:* We ensure that the person specification section of the job description includes specific reference to suitability to work with children.

5. **Applications:**

- a. *Application pack:* Candidates interested in a vacancy at the school will be sent an Application Form with an accompanying letter/email drawing their attention to the school's Safeguarding and Safer recruitment policy.
- b. *Application form:* All applicants will be required to complete an application form containing questions about their academic and employment history, personal details, current and former names, current address and their National Insurance Number, qualifications including details of awarding bodies and dates, details of referees and a statement of their personal qualities and experiences that the applicant believes are relevant to their suitability to the post advertised and how they meet the person specification. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. A curriculum vitae will not be accepted in place of the completed application form but can be considered in addition. The application form will ask candidates if they wish to declare anything in light of the requirement for a DBS disclosure and candidates will be asked to sign that they understand it is an offence to apply for the role if they are barred from engaging in regulated activity relevant to children. The application form will also ask for details of attendance in previous employment.

6. **Screening:**

- a. *Application checking:* We obtain and scrutinise comprehensive information from applicants taking up and satisfactorily resolving any discrepancies or anomalies that are identified.
- b. *Reference taking:* It is the school's strong preference to take up two references prior to final interview. In cases where references cannot be taken up before final interview, they will be taken post interview and if there are any areas of concern, a further interview will be arranged. See section below regarding References.
- c. *Proof of Age:* Prior to being interviewed, we require applicants to provide proof of age in accordance with the Guidance and KCSIE. Proof of date of birth is necessary so that the School may verify the applicant's identity and check for any unexplained discrepancies in their employment and education history. The School does not discriminate on the grounds of age.

7. **Interviewing**

We conduct a face to face formal panel interview to explore the candidate's suitability to work with children as well as their suitability for the position being recruited.

The interview panel will consist of at least 2 and preferably 3 members of staff including one who has been trained in safer recruitment and a second who has the authority to make the decision on the appointment. A consensus about the required standards for the post will be reached and issues considered and explored in interview in line with the agreed assessment criteria. The panel will assess the candidate's attitude towards children and young people and his/her ability to support the School's safeguarding policies. Questions relating to child protection and safeguarding children will be asked in every interview prior to an offer of appointment. Applicants will be given the opportunity to declare anything that may impact a decision.

Notes of the formal interview will be taken and copies retained on the School's files. Teaching candidates will be observed in taught lessons wherever possible and notes kept of the outcome of the observation.

8. **Conditional Offer**

The preferred candidate for a vacancy will be issued with an offer after interview subject to the appropriate pre-employment checks being carried out. Details of each check are given below and which checks apply to which workers is given at Appendix 1.

9. **Pre-employment Checks:**

- a. *Verification of Identity and Qualifications:* Proof of age/ date of birth will have been provided by applicants at interview stage. In addition, applicants who have been offered employment are required to provide evidence of identity, right to work in the UK (this includes EU nationals), address and qualifications as set out at Appendix 1 to comply with DBS identity checking guidelines. The Teaching Regulation Agency's (TRA) Employer Access Service is used to verify any qualified teacher status (QTS), and the completion of teacher induction or probation.
- b. *Enhanced DBS/ Barred List/ List 99*
 - i. *Purpose:* The school undertakes this check to identify whether an applicant is barred from working with children by inclusion on the Barred List maintained by the DBS.

- ii. *Eligible Posts:* The school is aware that an Enhanced DBS can only be sought if an individual is undertaking “regulated activity”. Any unsupervised position undertaken at, or on behalf of, the School (whether paid or unpaid), will amount to “regulated activity” if it is carried out:
- “frequently”, meaning once a week or more; or
 - “overnight”, meaning between 2.00 am and 6.00 am; or
 - “intensively”, meaning four times or more in a 30 day period; and
 - provides the opportunity for contact with children.

However, the school has taken the view that it will seek an enhanced DBS for the following posts as it considers that they do amount to “regulated activity”: all teaching and non-teaching posts, part-time staff, temporary and supply staff, advisors, directors and the Proprietor, regular volunteers and visiting staff, such as musicians and sports coaches. Limited occasions when an Enhanced DBS is not required to could include an administrative post undertaken on a temporary basis in the School Office outside term time.

- iii. *DBS Update Service* – Individuals can join the DBS update service at the point that an application for a new DBS check is made. If the individual is already part of the update service Knightsbridge School will use the service to check no information has been added to their check since its issue. Before doing so the school will always obtain consent from the individual to carry out the online check, confirm the DBS Certificate matches the individuals identity and examine the original certificate to ensure its valid for the role and the level of check is appropriate.
- iv. *Three-month rule:* It is not necessary for the School to undertake a DBS check where an individual has worked in a school or further education college in England in the three months prior to commencing work at the School. However, if an individual commences work at the School in such circumstances we are still required to undertake a fresh Barred List check on all staff undertaking regulated activity using the Teaching Regulation Agency’s (TRA) Employer Access Service. It is the School’s practice to undertake DBS checks on all new appointments to the workforce prior to commencement of employment.
- v. *DBS for Overseas applicants:* DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence.
- vi. *Receipt of DBS Check:* The DBS issues a DBS disclosure certificate to the subject of the check only, rather than to the School. It is a condition of employment with the School that the **original** disclosure certificate is provided to the school prior to the individual’s start date. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School. In line with the Data Protection Act 2018 the school will not retain a copy of the DBS.
- vii. *Delay in receipt of DBS Check:* If there is a delay in receiving a DBS disclosure the Head has discretion to allow an individual to begin work pending receipt of the disclosure. This will only be allowed if all other checks, including a clear check of the Barred List, have been completed, a risk assessment conducted and appropriate supervision put in place. Where an individual has worked in a school or further education college in England in the three months prior to



commencing work at the School and already has a valid DBS as a result of this, supervision may not be necessary.

- viii. *Disclosure of Convictions:* The school is aware that certain convictions will not be disclosed by the DBS in line with current regulations. However, there a large number of offences, which includes certain sexual, violent and other offences that are considered so serious they will always be disclosed, regardless of when they took place or of the person's previous or subsequent criminal record. The list of "specified offences" can be found at:

<https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check>

If a conviction is disclosed on a DBS, the school will consider whether it is appropriate or not to confirm the employment of the individual, in line with the school's policy on the recruitment of ex-offenders given at Appendix 3.

c. *References:*

The application form requests both professional and character references, one of which should be from the applicant's current or most recent employer.

Applicants for which the school will be their first employment, may provide two references from their latest educational establishment if they are unable to provide any other third party reference. One of these references must be from the Head of the educational establishment, or if not from the Head, countersigned by the Head.

Additional references may be requested where appropriate. For example, where the applicant is not currently working with children but has done so in the past, a reference from that employer will be requested in addition to that from the current or most recent employer if this is different. No referee should be a relative or someone known to the applicant solely as a friend; we look to gain references from people in positions of authority at the applicant's current or previous employers.

It is our strong preference that references are provided prior to the interview so that any issues of concern raised by the reference can be explored further with the referee and taken up with the candidate during interview. In the event that a referee refuses to provide a reference, the School will attempt to establish why, and will then seek an alternate referee.

Referees will be asked to confirm that they are satisfied with the applicant's suitability to work with children and should provide facts (not opinions) of any substantiated safeguarding allegations. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference for example misconduct or poor performance or where the low level concern has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference. Any concerns identified will be followed up. Any failure of a referee to provide a reference will be documented. Telephone verification will be sought to confirm the identity of the reference-giver.

The School will only accept references obtained direct from referees and will not rely on references or testimonials provided by the applicant nor on open references or testimonials. The school will ensure all electronic references originate from a legitimate source.

The School will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

- d. *Prohibition Order:* The school will check that all applicants for teaching positions are not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service. This has been our practice since September 2014 effective for such staff appointed since April 2012. A person who is prohibited must not be appointed to a role that involves teaching work.
- e. *Prohibition from Management:* Since 1 August 2015, the School has conducted a s. 128 check as part of the DBS check to ensure that any person appointed to a management position or Directors and Advisors after this date is not disqualified from holding a management position. This applies to appointments as a Director or Advisor and to the school's Strategic Leadership Team, the school's Senior Management Team and to all Heads of Department. This includes any internal appointments to such management roles if a s. 128 was not undertaken upon employment.
- f. *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 but **before** the appointment can be confirmed.

It is the School's practice that all applicants to whom an offer of employment is made must complete a Health Questionnaire. The School will arrange for the information contained in the Health Questionnaire to be reviewed by the School and if necessary referred to the School's medical advisor. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed 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.

Successful applicants will be required to sign a declaration of medical fitness confirming that there are no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the role. If an applicant prefers to discuss this with the School instead, or to attend an occupational health assessment to consider their fitness for the role, they should contact the Bursar so that appropriate arrangements can be made.

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.

- g. *Disqualification under Childcare Act 2006:* The school will check that all applicants for teaching, teaching assistant and administrative positions are not disqualified from looking after children under the Childcare Act 2006. This has been our practice since September 2015 effective for such staff appointed since September 2015. In addition the school requires all staff to complete a Disqualification Declaration form.



h. Checks on Employment/ Residence Overseas: Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools and colleges, this includes obtaining (via the applicant) an enhanced DBS certificate (including barred list check) even if the individual has never been to the UK. In addition the School will seek criminal records information from the police authorities in the relevant country/ies and/or certificates of good conduct from the relevant embassy/ies. Such documentation will be required for all countries in which the person has either lived and/or worked for a period of 3 months or more in the last 10 years. This applies to all new appointments after 1 September 2018; prior to this period overseas in the last 5 years were checked.

10. Types of workers:

A full list of the checks required for each category of worker who works in regulated activity is given at Appendix 1. The definition of each category of worker and any further clarification is given below

- a. *Teaching Employees:* those fulfilling teaching duties on the payroll of the school in a full time, part time or fixed term capacity
- b. *Support Employees:* those on the payroll of the school in a full time, part time or fixed term capacity other than Teaching Employees
- c. *Education Leadership:* those in roles of leadership responsibility for the education provision of the school to include those meeting this definition who are members of the school's Strategic Leadership Team, Senior Management Team and all Heads of Department
- d. *Support Leadership:* those in roles of leadership responsibility for aspects of the school other than the education provision to include those meeting this definition who are members of the school's Strategic Leadership Team and Senior Management Team.
- e. *Proprietor:* As defined in the School's registration with DfE
- f. *Directors, Advisors and Governors:* Any legal Director of Knightsbridge School Limited and /or anyone who sits on the board of the School.
- g. *Regular Volunteers:* A voluntary member of staff who volunteers his/her time, skills and abilities to the School free of charge who either may not be supervised or who falls within the definition of regulated activity. These volunteer helpers are usually parental helpers, members of the local community or individuals committed to a particular career path who wish to gain experience in a school environment in pursuit of their chosen professional goals. The School will also consider applications for volunteering from individuals who approach the School directly by telephone, email or letter.
- h. *Ad-hoc Volunteers:* A voluntary member of staff who volunteers his/her time, skills and abilities to the School free of charge on an occasional basis and under the full supervision of an employee.
- i. *Supply Teachers:* A qualified teacher employed by an Agency and supplied to the school
- j. *Visiting Speakers:* an external individual invited by the school to participate in a particular event. All visiting speakers to the school will be checked for suitability and will be supervised by at least one member of staff at all times when in the presence of any children. All visiting speakers will be subject to the provisions of the Visitors Policy and the Prevent Policy



- k. *Children in the workplace:* Secondary school aged children on work experience. Given that a DBS is not required, the school placing the student will be required to ensure that they are suitable for the placement.
- l. *Regular External Contractors:* Employees of external companies or self employed workers who work at the School; this will include: cleaners, catering staff, sports coaches, extra-curricular providers, visiting music teachers, independent consultants.
- m. *Occasional visiting therapists & counsellors:* specialist practitioners working one to one with particular pupils at the school or providing advice to staff on additional education needs of particular pupils.
- n. *Contractors:* tradespeople or buildings/ services specialists attending the school to carry out emergency repairs, perform routine maintenance of equipment or make structural changes to the property. The vast majority of such work will be undertaken during School closure periods. Should work be necessary during the school term, the Contractor will be required to report to reception on arrival, and to sign in/ out when they enter/leave school premises. They must present photo-identification upon arrival and must be expected in advance by the school site. Contracts will be issued with a visitor's pass and will be escorted to and from his/her destination, thereby avoiding unsupervised access to children. In addition, all staff will be instructed to be vigilant to prevent children from accessing areas where builders etc are working, not only for reasons of safeguarding children but also for risks posed by Health and Safety considerations.

11. Data Retention

- a. *Successful Candidates:* All information gathered as part of the recruitment and verification process will be retained on the employee's file for the duration of the worker's engagement with the school and indefinitely thereafter for the purposes of child protection. The only exception to this is the copy of the DBS certificate which will be removed from file and destroyed after 6 months; a record will however be kept of the DBS number.
- b. *Candidates not progressed:* If a candidate is not employed, either because the school does not extend or confirm a job offer or because the candidate declines a job offer, all information gathered as part of the recruitment and verification process will be retained for up to 1 year following the candidate's withdrawal from the process.

Reviewed by: Shona Colaco

Date: August 2021

Approved by: Aatif Hassan

Signed

Date: August 2021



Appendix 1 Safeguarding Checks Grid

	On SCR?	Vetting Form	Application Form	ID 1 - Passport	ID 2	ID 3	Ref 1	Ref 2	Interview Notes	DBS - obtained by school	DBS Number Recorded (check obtained by third party)	Overseas Police Checks s 428 check - leadership	Right to Work	Health Questionnaire	Disqualification Form	Barred List Check	Prohibition Order Check	EEA check	Internet Check	Qualification Check
Teaching Employees	Yes		x	x	x	x	x	x	x			x	x	x	x	x	x			x
Support Employees	Yes		x	x	x	x	x	x	x			x	x	x	x	x				x
Education Leadership	Yes		x	x	x	x	x	x	x			x	x	x	x	x	x			x
Support Leadership	Yes		x	x	x	x	x	x	x			x	x	x	x	x				x
Proprietor	Yes		x	x	x	x	x	x	x			x	x	x	x	x				
Directors, Advisors and Governors	Yes		x	x	x	x	x	x	x			x	x	x	x	x				
Regular Volunteers	Yes		x	x	x	x	x	x	x			x	x	x	x	x				
Ad-hoc volunteers	No			x												x				
Supply Teachers	Yes	x		x	x					x										x
Visiting speakers	No			x	x											x				x
Children in the workplace	No																			
Regular External Contractors - employed by a company	Yes	x		x	x					x										x
Regular External Contractors - self employed	Yes		x	x	x	x	x	x	x			x	x	x	x	x				
Occasional Visiting Occupational Therapists/ Counsellors	No	x		x	x						x					x				

Appendix 2 Identity Verification

All individuals offered work by the School must comply with the following requirements to verify their identity. They must provide:

- Current and valid passport including UK work visa where required **and**
- two further documents from either of Group 1, Group 2a or Group 2b, one of which must verify the applicant's current address; and
- original documents confirming any educational and professional qualifications required for the job role.

Where the individual 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.

Group 1: primary trusted identity credentials

- current valid passport
- biometric residence permit (UK)
- current driving licence (full or provisional) (UK / Isle of Man / Channel Islands; photo card with the associated counterpart licence; except Jersey)
- birth certificate (UK & Channel Islands) - issued at the time of birth (within 42 days of date of birth); Full or short form acceptable including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces

Group 2a: trusted government / state issued documents

- current UK driving licence (old style paper version)
- current non-UK driving licence (valid for up to 12 months from the date the applicant entered the UK)
- birth certificate (UK and Channel Islands) – issued at any time after the date of birth by the General Registrar Office / relevant authority i.e. Registrars)
- marriage / civil partnership certificate (UK and Channel Islands)
- adoption certificate (UK and Channel Islands)
- HM Forces ID card (UK)
- fire arms licence (UK and Channel Islands)



Group 2b: Financial / social history documents

- mortgage statement (UK or EEA)**
- bank / building society statement (UK and Channel Islands or EEA)*
- bank / building society account opening confirmation letter (UK)
- credit card statement (UK or EEA)*
- financial statement ** - e.g. pension, endowment, ISA (UK)
- P45 / P60 statement **(UK and Channel Islands)
- council tax statement (UK and Channel Islands) **
- work permit / visa (UK) (UK Residence Permit) **
- letter of sponsorship from future employment provider (non UK / non EEA only valid for applicants residing outside the UK at the time of application)
- utility bill (UK)* – not mobile telephone
- benefit statement* - e.g. child benefit, pension
- a document from central / local government/ government agency / local authority giving entitlement (UK and Channel Islands)*- e.g. from the Department for Work and Pensions, the Employment Service , HM Revenue & Customs (HMRC), Job Centre, Job Centre Plus, Social Security
- EU national ID card
- cards carrying the PASS accreditation logo (UK)
- letter from Principal or College Principal (UK) for 16-19 year olds in full time education. This is only used in exceptional circumstances if other documents cannot be provided.

Note

If a document in the list of valid identity documents is:
denoted with * - it should be less than three months old
denoted with ** - it should be less than 12 months old
not denoted – it can be more than 12 months old

Appendix 3 Policy on recruitment of ex-offenders

Background

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

All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except for those to which the DBS filtering rules apply. A failure to disclose a previous conviction (which should be declared) 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.

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

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

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

- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or



- serious class A drug related offences, robbery, burglary, theft, deception or fraud.

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

If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

Assessment procedure

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Bursar for support staff or the Head for all academic staff before a position is offered or confirmed.

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