



ELTHAM COLLEGE
FAMILY OF SCHOOLS

Safer Recruitment

**For the Eltham College Family of
Schools**

Last reviewed: Sep 2024



Version Control Information

Reason for Amendment	Name	Date	Main Changes
Annual Review	HR Manager	August 2016	Updated to include reference to new pre-employment checks and procedural revisions.
Annual Review	HR Manager	August 2017	Updated to reflect removal of requirement for Safer Recruitment-trained panel member; para 16: inclusion of section regarding Governors.
Removal of conditional language	HR Manager	February 2018	Removal of conditional language
Updated to reflect ISBA guidance	HR Manager	May 2018	Minor changes for clarity and data protection section updated to reflect GDPR.
Updated in light of KSCIE 2018	HR Manager	July 2018	References for internal candidates and checking legitimacy of electronic references.
Updated in light of revised DfE guidance	HR Manager	September 2018	Removal of Disqualification by Association references
Review	HR Manager	March 2019	None
Annual Review	HR Manager	September 2019	Minor amendments to wording, inclusion of Policy on Recruitment of Ex-offenders, clarification of process to recruit Headmaster and Bursar
Annual Review	HR Manager	April 2020	None
Review	HR Manager	January 2021	Removal of reference to EEA pre-employment checks
Annual Review	HR Manager	August 2021	Minor amendments to wording for clarity.
Annual Review	HR Director	August 2023	Updates regarding online searches, and self-declaration form.
Annual Review	HR Director	September 2024	Re-formatted to reflect family of schools. Minor amendments to wording for clarity.

Other Related Documents

- Policy on the Recruitment of Proprietors and Governors;
- Safeguarding Policy (including Child Protection);
- Equal Opportunities Policy (Workers);
- Staff Privacy Notice;
- Data Protection Policy;
- Accessibility Plan.



1. General

The Eltham College Family of Schools (“the School”) is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

The School aims to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

This policy does not form part of any employee’s terms and conditions of employment and is not intended to have any contractual effect. It is provided for guidance to all current or prospective members of staff who are required to familiarise themselves and comply with its contents. We reserve the right to amend its content at any time.

All queries on the School’s Application Form and recruitment process must be directed to the HR Director, Emma Hutchinson (emh@eltham-college.org.uk).

An entry will be made on the Single Central Register for all current members of staff at the School, the proprietorial body and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.

All checks will be made in advance of appointment or as soon as practicable after appointment.

2. Scope of this Policy

The Recruitment, Selection and Disclosures Policy and Procedure herewith refers and applies to staff directly recruited and employed by the School. In the Education (Independent Schools Standards) (England) Regulations 2014, staff are defined as:

Any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer.

In the case of agency or contract workers, the School sets out our safeguarding requirements in the contract with the organisation and the School must also obtain written confirmation from the agency or company that it has carried out the same checks as the School would otherwise perform on any individual working at the school or college (or who will be providing education on the school or college’s behalf, including through online delivery). The School conducts identity checks on agency and contract workers on arrival in School and, in the case of agency workers which includes supply staff, the School must be provided with a copy of the appropriate level of DBS check for such staff.

The School will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure – renewed every 3 years, right to work in the UK, barred list, prohibition, qualifications, overseas checks plus, those checks set out in KCSIE as ‘pre-employment’ checks). The Single Central Register shows these checks have been made and the School carries out its own identity check and has seen a copy of the disclosure (whether or not it discloses any information).



Certain individuals are automatically disqualified from acting in senior management positions within a charity. Whether an individual falls into the category of a senior management position is judged using the following criteria:

- A person who is accountable only to the governors, and who carries overall responsibility for the day-to-day management and control of the charity. For the Eltham College family of schools, this would be the Headmaster/CEO.
- A person who is accountable only to the Head or the governors, and who is responsible for the overall management and control of the charity's finances. At For the Eltham College family of schools, this would be the Bursar.

Being disqualified means that a person can't take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or 'waived') the disqualification.

In respect of contractors, the School will determine the appropriate level of supervision depending on the circumstances. Please refer to the Supervision of Contractors' policy for further information.

Any staff who TUPE transfer into the School's staff will be required to undertake the statutory requirements with regard to safer recruitment checks.

If staff are transferred under TUPE (gap of three months or less and information complete), Eltham College will ask for appropriate information to be provided from the former employer and a note made on the Single Central Register that details have been accepted under TUPE.

3. Aims

The aims of the School's recruitment policy are as follows:

- to recruit staff of the highest possible quality who will maintain and indeed improve the education that the School offers, and who will contribute to the academic, co-curricular and pastoral life of the School;
- to ensure that all staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all staff appointments are made fairly and transparently, and that all job applicants are considered equitably and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including gender, sexual orientation, marital or civil partner status, pregnancy or maternity, gender reassignment, race, religion or belief, disability or age;
- to ensure compliance with the relevant recommendations and guidance including Keeping Children Safe in Education, Safeguarding Children: Safer Recruitment and Selection in Education Settings and the Disclosure and Barring Service Code of Practice;
- 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 deter potential offenders from applying; all advertisements make reference to the School's Child Protection and Safeguarding Policy.

The recruitment process must be professional and thorough, but warm and welcoming. All applicants for posts, whether successful or not, should take away a positive image of the School.



4. Recruitment and Selection Procedures

a. Authorisation to Recruit

The need for an appointment is identified by the line manager and authorisation to recruit is given by the Headmaster, after consultation with the Bursar regarding budget implications.

b. Job Specification

Before any recruitment can commence an up to date job specification must be produced.

In the case of an existing post, the current job specification must be reviewed to ensure it reflects the current duties and responsibilities of the post and current “house” style.

c. Advertisements

The school will advertise all roles, both internally and externally, to attract the most diverse group of applicants and ensure a fair, transparent and structured process is always being applied. Adverts for vacancies will demonstrate the School's commitment to safeguarding in recruitment and vetting procedures, protecting every potential applicant from unfair practice and ultimately safeguarding children as much as possible.

d. Applications

The School will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms, but are permitted to be submitted alongside an Application Form.

The School will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. Candidates for employed posts will receive a Job Description for the role applied for.

Checks will be made of previous employment history to ascertain satisfactory reasons for any gaps in employment. These checks will then be checked against references and any discrepancies discussed with the candidate.

The successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service (“DBS”) for the position and, where appropriate, a check of the Barred List will be undertaken. Any offer of employment will be conditional on obtaining such satisfactory checks. Additionally, successful applicants should be aware that they are required to notify the school immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration

The statutory guidance “Disqualification under the Childcare Act 2006” applies to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.



The school takes its responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect his/her suitability to work with children must notify their manager and the relevant Head immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff and/or successful candidates who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Head or Director of HR for more details.

If the candidate is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.

If the candidate is not currently working with children but has done so in the past, the School will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

The School will shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. At least two people will carry out the shortlisting exercise, consider any inconsistencies, look for gaps in employment and reasons given for them and explore all potential concerns.

As part of the shortlisting process, the School will normally carry out a social media check on candidates offered an appointment as part of its due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which the School may want to explore with an applicant further. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

e. Invitation to Interview

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

Shortlisted candidates should be asked to complete a self-declaration form in relation to their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. Applicants will be asked to sign a declaration confirming that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

The School will, where possible, obtain references prior to interview. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview.



All formal interviews will normally have a panel of at least two people chaired by the Head, Bursar or another designated senior member of staff. It is recommended best practice that at least one person on the appointment panel will have undertaken safer recruitment training. The Chair of Governors should chair the panel for the Head's appointment, and be involved in the selection of the Bursar. At least one Governor will also be involved in the appointment process for the Head of Blackheath Prep or Head of Eltham College Junior School. The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Panel Chair as to whether or not an interviewer should withdraw from the panel.

The interview will normally be conducted in person and the areas which it will explore will include suitability to work with children including where appropriate, any discussion of information shared by a candidate in their self-declaration form.

All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

The School requests that all candidates invited to interview also bring with them:

1. A current driving licence including a photograph or a passport and a full birth certificate;
2. A utility bill or financial statement issued within the last three months showing the candidate's current name and address;
3. Where appropriate any documentation evidencing a change of name;
4. Where applicable, proof of entitlement to work and reside in the UK.

Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

Candidates with a disability who are invited to interview should inform the School of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

f. Interview Process

The interview will usually include a tour of the School with a senior member of staff or prefect, interviews with the Headmaster (or Deputy in his absence) or Bursar and/or Head of Department. For academic staff, the process also includes the teaching of part or all of a lesson. For non-academic staff, the process will be adjusted to reflect the nature of the role. Panel members may make notes during the interview to inform the final decision, but such notes are not retained. Instead the panel chair or lead interviewer may record a brief summary of the outcome of the interview to explain the decision.

Question areas and tasks for all interviews must be determined in advance and equally applied to all candidates. It is entirely appropriate to supplement these with questions arising from the candidate's initial application and to follow up on any areas requiring clarification or further detail. Candidates may also be questioned on any matters arising from references received prior to the interview, where permission has been given by the referee to do so.

Candidates must be asked to explain any gaps in their employment and education history. The reasons given must be recorded by the panel as part of the interview notes.

Interviews must include questions to assess the candidate's attitude to safeguarding and child protection.



g. Appointment

Those staff involved within the selection procedure meet, ideally on the same day, to discuss and select the preferred candidate. The Headmaster (for teaching roles) or Bursar, head of department or HR Director (for support roles) will make the offer of a post by telephone as soon as is possible and then confirm the offer in writing.

The HR department follows up by sending a new starter pack containing the following:

- Detailed offer letter;
- Contract of employment;
- Additional details form;
- Medical questionnaire;
- Disclosure and Barring Service application guidance;
- HMRC Starter checklist;
- Staff Handbook, Keeping Children Safe in Education Part 1 and Staff Handbook declaration.

Once the offer has been verbally accepted, all other applicants are informed of the completion of the process.

The successful candidate is invited back to the School by the relevant Head of Department to familiarise themselves with the School, staff and further details of the post before taking up the role.

Pre-employment Checks

Any offer to a successful candidate will be conditional upon:

1. Receipt of at least two satisfactory references (if these have not already been received);
Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK (if not already received);
2. A satisfactory enhanced DBS check and, if appropriate, a check of the Children's Barred List maintained by the DBS;
3. For a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State or any sanction or restriction imposed (that remains current) by the historic General Teaching Council for England before its abolition in March 2012. Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:
 - Planning and preparing lessons and courses for pupils;
 - Delivering and preparing lessons to pupils;
 - Assessing the development, progress and attainment of pupils; and
 - Reporting on the development, progress and attainment of pupils;
4. Verification of professional qualifications, including Qualified Teacher Status, where appropriate;
5. Verification of successful completion of statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999);
6. Where the successful candidate has worked or been resident overseas: Such further checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing the School with proof



- of his/her past conduct as a teacher in the form of a letter of professional standing from the professional regulating authority in the country in which s/he has worked;
7. Evidence of satisfactory medical fitness;
 8. Receipt of a signed Self-Declaration form showing that the candidate is not disqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006;
 9. For a candidate to be employed into a senior management position as set out above under “Scope of this Policy”, receipt of a signed “senior charity manager positions: automatic disqualification declaration” confirming that the candidate is not disqualified from acting in a senior management position for a charity in accordance with the automatic disqualification rules for charities.
 10. Where the successful candidate will be taking part in the management of the school, a check will be carried out under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors and Senior Management Team members.

It is the School's practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by the School in strictest confidence and processed in accordance with the [Staff Privacy Notice](#) and [Data Protection Policy](#). 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 workload, extra-curricular activities, and/or layout of the School.

The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

h. References

The School will seek the references referred to in section 4 above for shortlisted candidates (including internal applicants) and will approach previous employers for information to verify particular experience or qualifications, before interview. One of the references must be from the applicant’s current or most recent employer. References must be received from a senior person with appropriate authority. If the candidate does not wish the School to take up references in advance of the interview, they should notify the School at the time of applying by indicating as appropriate on the application form and stating their reason.

The School will ask all referees if the candidate is suitable to work with children and to provide facts of any substantiated safeguarding concerns or allegations that meet the harm threshold set out in Part 4 of the statutory guidance ‘Keeping Children Safe in Education’. Substantiated allegations that meet the harm threshold should be included in references. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated, or malicious should not be included in any reference.

The School 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. Where references are received electronically, the School will ensure they originate from a legitimate source. Verbal telephone checks of references will be undertaken for key roles or where it is felt this would be appropriate in other instances.



The School will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.

5. Criminal Records Policy

The School will refer to the Department for Education (“DfE”) document, ‘Keeping Children Safe in Education’ and any amended version in carrying out the necessary required DBS checks.

The School complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request, or accessed here:

<https://www.gov.uk/government/publications/dbs-code-of-practice>.

There are limited circumstances where the school will accept a check from another educational institution which are as follows:

This is where the new member of staff (“M”) has worked in: –

- (a) A school or a maintained school in England in a position which brought M regularly into contact with children or young persons;
- (b) A maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or
- (c) An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons,

during a period which ended not more than three months before M’s appointment.

In these circumstances the school may apply for a disclosure but is not required to do so. A new, separate barred list check will be obtained.

DBS Update Service

Where an applicant subscribes to the DBS Update Service the applicant must give consent to the school to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required.

If the disclosure (or another part of the background screening checks) is delayed

A short period of work is allowed under controlled conditions, at the discretion of the relevant Safeguarding Lead and Bursar, taking into account the significance of the complete versus incomplete checks:

- Without confirming the appointment;
- With appropriate safeguards taken (for example, supervision);
- Safeguards reviewed at least every two weeks by the Bursar and relevant DSL;
- The person in question is informed what these safeguards are; and
- A note is added to the single central register and evidence kept of the measures put in place.

Where the DBS disclosure is incomplete, this assessment requires:



- A satisfactory check of the barred list if the person will be engaging in regulated activity and all other relevant checks (including any appropriate prohibition checks) having been completed satisfactorily;
- The DBS application having been made in advance.

6. Retention, Security of Records and Data Protection Obligations

The School will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.

The School will comply with its data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice and the Data Protection Policy.

7. Delegated Authority

The Headmaster and Bursar may choose to delegate any or all of their responsibilities to an appropriate member of staff. The Headmaster and Bursar are responsible for ensuring that the member of staff is fully aware of their obligations as described above.

8. Recruitment of Specific Groups

Governors

Governors are appointed according to the requirements of the Articles of Association and in line with the school's Policy on the Recruitment of Proprietors and Governors.

Headteacher

Recruitment will follow the process for other staff, but the process will be led by the Chair of Governors and involve other individuals as the Chair deems appropriate.

In addition to the vetting checks prescribed by the Independent Schools Inspectorate, the appointment of the Headmaster will also be conditional on the successful candidate satisfactorily undertaking a medical examination by an independent medical professional.

Bursar

Recruitment will follow the process for other staff, but the process will be led by the Headteacher in consultation with the Chair of Governors.

Volunteers

Volunteers may be recruited through a variety of methods including but not limited to recommendations by trusted individuals, speculative approaches and direct advertising.

'One-off' volunteers for day outings, school concerts and such do not require vetting checks but they should not be unsupervised and must not undertake any kind of personal care.



The School will apply a risk based approach when deciding what checks, if any should be undertaken in respect of volunteers.

All volunteers are normally subject to an informal interview.

Where a volunteer is unsupervised and works in 'regulated activity', the school will carry out an Enhanced level DBS check with a check of the Children's Barred List.

Where a volunteer is supervised, the school will consider the following when deciding whether or not to apply for a DBS check:

- the nature of the work with children;
- what we know about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability; and
- whether the role is eligible for an enhanced DBS check.

Where appropriate, references are sought and we check with the school community for any concerns.

Where any or all of the above checks are carried out, these are recorded by the HR department on the Single Central Register.

Peripatetic Music Teachers and Sports Coaches

In line with regulatory guidance, peripatetic music teachers and sports coaches are deemed to be 'staff' for the purposes of vetting checks. As such, they are subject to the procedures in section 14 of this policy.

Self-employed Contractors

Self-employed contractors may be vetted by their professional associations, where this is available to them. In such cases, the School obtains confirmation of such checks from the professional association.

Where the self-employed contractor is not able to be vetted by a professional association, the School assists by processing appropriate checks on their behalf. If no checks are in place, then they are supervised whilst on site.

The HR department must be informed of any contractors who need background screening checks to be completed so that the checks are in place before they do any work for us.

The School checks the identity of all contractors upon their arrival on site.

Refer to the [Management of Contractors](#) policy for further information.

Contractors Employed by Third Parties

The employing organisation is responsible for providing confirmation that appropriate checks have been carried out on their staff, including Enhanced DBS checks. If they cannot do so, then their staff must be supervised whilst on site.

The Head of Maintenance operates a preferred supplier list so that the number of maintenance contractors is kept to a minimum and to ensure that we keep track of our decisions and information regarding checking them.



The HR department must be informed of any contractors who need background screening checks to be completed so that the checks are in place before they do any work for us.

The HR department is responsible for contacting the companies with a standard email asking them to confirm the checks that have been carried out.

The School checks the identity of all contractors upon their arrival on site.

Refer to the [Management of Contractors](#) policy for further information.

Occasional/Temporary Contractors

If it is not possible to find workers at short notice who have already been checked, the School will use its discretion in relation to occasional or temporary contractors.

In these circumstances, a risk-assessment approach will be taken, led by the head of department engaging the contractor, which may mean supervising the contractors whilst they are on site.

Student Teachers

Student teachers undertaking placements at the School will have been checked by their academic organisation. The student is asked to present their disclosure certificate and proof of identity upon arrival.

Supply Teachers and Other Agency Staff

Where supply teachers or other agency staff are engaged, the HR department obtains confirmation from the agency that they have carried out the following checks:

- Identity check;
- Barred list check (for all posts meeting the definition of 'regulated activity');
- Enhanced DBS check;
- Professional qualifications check;
- Proof of right to work in the UK;
- Medical fitness;
- Overseas checks (where applicable);
- Previous employment history;
- Two satisfactory references;

The completion of these checks is recorded by the HR department on the Single Central Register.

Supply staff are required to present their disclosure certificate and proof of identity upon arrival.



9. Appendix

Policy on the Recruitment of Ex-Offenders

The School will not unfairly discriminate against any candidate 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 individual 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 candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for the School to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for the School to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful for the School to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the statutory guidance "Disqualification under the Childcare Act 2006".

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. The School will report the matter to the Police and/or the DBS if:

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

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;
- whether the conviction or caution is 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020 (if yes, it will not be taken into account);
- 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;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; 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, 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.