

Safer Recruitment Policy 2024-2025

Author:

M Keeley, DSL

Approved by the Governing Board:

September 2024

Date of next review:

August 2025

**MORE
HOUSE
SCHOOL**

KNIGHTSBRIDGE

Recruitment and selection process

Policy Statement

The School is committed to operating safer recruitment procedures in compliance with relevant legislation, including part 3 of KCSIE 2024 and best practice. The purpose of this policy is to set out the minimum requirements of the School's recruitment process which aims to:

- attract the best possible applicants to vacancies;
- deter prospective applicants who are unsuitable for work with children or young people; and
- identify and reject applicants who are unsuitable for work with children and young people.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

Key elements of safer recruitment are:

- robust recruitment and selection processes;
- rigorous vetting and checking processes; and
- strong induction, probation, appraisal and performance management systems.

This Policy covers the first two matters and should be considered in conjunction with the following Associated Policies:

- Appraisal Procedures - Teaching Staff and Support Staff;
- Inclusion Policy;
- Staff Induction Procedure;
- Data Protection Policy, and
- Policy on Recruitment of Ex-Offenders

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our School's commitment to safeguarding and promoting the welfare of children;
- That safeguarding checks will be undertaken;
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children, and
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Applicants will be supplied, as a minimum, with the following:

- a recruitment pack, containing:
 - a Job Description which, in addition to explaining the job purpose, context and the main requirements of the job, will include information explaining what the responsibilities are regarding safeguarding and promoting the welfare of children along with the need to update training in this regard, if applicable;
 - a "Person Specification" providing details of necessary qualifications, experience, skills and knowledge, and key competencies including criteria that reflects a

- commitment to safeguarding that is relevant to the School and the role;
- information about the School, the interview process and a safeguarding statement;
- a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- the School's Safeguarding and Child Protection Policy including our recruitment and selection process and policy on the recruitment of ex-offenders;

Application forms

Our application form will:

- include a copy of, or link to, our Safeguarding and Child Protection policy which includes our policy on the employment of ex-offenders
- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity), and
- require applicants to provide:
 - personal details, current and former names, current address and national insurance number;
 - details of their present (or last) employment and reason for leaving;
 - full employment history, (since leaving School, including education, employment and voluntary work) including reasons for any gaps in employment;
 - qualifications, the awarding body and date of award;
 - details of referees/references, and
 - a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Complete a self-declaration (see attached) of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history;
- Whether they are included on the barred list;
- Whether they are prohibited from teaching;
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales;
- Any relevant overseas information, and
- Sign a declaration confirming the information they have provided is true.

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before the interview, where possible. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references;
- Liaise directly with referees and verify any information contained within references with the referees;
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is School based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations;
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed;
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children;
- Ensure electronic references originate from a legitimate source;
- Contact referees to clarify content where information is vague or insufficient information is provided;
- Establish the reason for the candidate leaving their current or most recent post;
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate, and,
- Resolve any concerns before any appointment is confirmed.

Interview and selection

Selection techniques will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of short-listed applicants and where appropriate involve a taught lesson (as this is a good indicator of suitability to work with children from a safeguarding perspective).

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this;
- Explore any potential areas of concern to determine the candidate's suitability to work with children, and
- Record all information considered and decisions made.

Pre-appointment vetting checks

We will record all information on the checks carried out in the School's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity;

- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken;
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available;
- Verify their mental and physical fitness to carry out their work responsibilities;
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards;
- Verify their professional qualifications, as appropriate;
- Ensure they are not subject to a prohibition order if they are employed to be a teacher;
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#), and
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (Section 128) direction made by the secretary of state.

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a School or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a School or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Conditional offer of appointment

Any offer of appointment to the successful applicant will be conditional upon receipt of satisfactory pre-employment checks. Regulated employment can only commence on receipt of an appropriate DBS certificate. This will be stated at the interview and in the offer letter.

Applicants are required to sign a contract incorporating the School's standard Terms and Conditions of Employment once pre-employment checks have been satisfactorily completed.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

In the event that we decide to:

- make an offer of contracted (full or part-time) employment to a person sourced from a teaching agency and subsequently interviewed as a potential agency employee, or
- make an offer of contracted (full or part-time) employment to an existing agency member of staff

The person will be subject to recruitment procedures (described above), including:

- the completion of an application form;
- the receipt of two references (one of which will be an internal reference when the employee has worked for the School for three months or longer);
- an interview, and
- vetting checks as described above for new staff.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the School has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than six months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the School.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors

All Governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The Chair of the Board will have their DBS check countersigned by the Secretary of State.

All Governors will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#));
- Identity;
- Right to work in the UK, and
- Other checks deemed necessary if they have lived or worked outside the UK.

Staff working in alternative provision settings

When we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the School makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the School is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner Schools abroad to ensure that similar assurances are undertaken prior to the visit.

Induction and Probationary Period

All staff who are new to the School will receive induction training that will include the School's safeguarding policies and guidance on safe working practices, overseen by the ECT and New Staff Coordinator.

New staff are paired with a mentor (usually the Head of Department or member of the Senior Management Team), who will guide the mentee in the first year of their time at the School.

The mentor will provide feedback to the Head or senior member of staff, who will meet the mentee at least once each half term in order to provide support and discuss the feedback received.

Retention of Records

If an applicant is appointed, the School will retain any relevant information provided on their application form (together with any attachments) as well as documents used to verify the successful candidate's identity, right to work and required qualifications will be kept on their personnel file. If the application is unsuccessful, all documentation relating to the application will be confidentially destroyed after six months.

The School complies with the provisions of the DBS Code of Practice for Retention and Security 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 the Designated Safeguarding Lead and Designated Safeguarding Lead Deputies, the Director of Finance and Resources and the Head;
- not retain disclosure information or any associated correspondence for longer than is necessary. Generally, this will be for a maximum of six months. For successful applicants, 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;
- ensure that any disclosure information is destroyed by suitably secure means such as shredding; and
- prohibit the photocopying or scanning of any disclosure information.

The School also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of disclosure information and has a written policy on these matters which is available on request.

Policy on Recruitment of Ex-Offenders

Introduction

More House School meets the requirements for exemption from the Rehabilitation of Offenders Act 1974.

This means that, where a role involves regulated activity, applicants are required to disclose **relevant** convictions and cautions (excluding exemptions - see section 2) if **shortlisted** for employment in our school.

Roles involving regulated activity will also be subject to an enhanced Disclosure and Barring Service (DBS) check with barred list check.

Having a criminal record will not necessarily bar you from working at our School. The success of your application will depend on your suitability for the job, the nature of the role, and the circumstances and background of any offences.

We are committed to:

Our duty to safeguard children under:

- [Keeping Children Safe in Education](#)
- [The DBS code of practice](#)

The fair treatment of all applicants and equality of opportunity

Protections and exemptions

‘**Specified offences**’ will always be disclosed on a DBS certificate, and should always be included in self-declarations - see the [government’s list](#) for further details.

It is a criminal offence for any person who is barred from working with children to apply for a position in a school. The School will make a report to the DBS and/or the police as appropriate, if it receives an application from a barred person.

‘**Protected offences**’ are certain old or minor offences that may not be disclosed on a DBS check. Guidance as to whether a caution or conviction is ‘protected’ can be found in:

The Ministry of Justice’s [Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975](#)

The government’s tool to [check whether to disclose cautions or convictions](#)

Applicants **should not** list any ‘protected’ offences on their self-declaration form, and we will not take them into account if we are made aware of them.

Responsibilities

The Head

- Uphold the School’s commitment to the fair treatment of all job applicants;
- Make sure all job application forms contain clear and relevant information about what

cautions or convictions applicants are expected to disclose, and what safeguarding checks the School will carry out, and at what stage in the application process, and

- Make sure staff involved in the recruitment process have received appropriate guidance and training about their legal duties in employing ex-offenders, and assessing the relevance and circumstances of offences.

Staff involved in the recruitment process

- Treat applicants fairly, including in relation to any history of offending;
- Maintain privacy for applicants, making sure that information about applicants' criminal records won't be seen by anyone outside of the recruitment process;
- Make sure that all shortlisted applicants complete a self-declaration form before the interview stage, and that all job offers are conditional, subject to appropriate safeguarding checks;
- Hold discussions with applicants about their disclosures, where relevant, and make decisions about suitability based on the circumstances and background of offences, and
- Seek specialist legal/HR advice where relevant.

All job applicants

- Familiarise themselves with the requirements for self-disclosure, and whether they have any previous convictions or cautions that must be disclosed;
- Complete self-declaration forms honestly and completely, disclosing all required spent and unspent convictions and cautions (excluding 'protected' offences), and
- Participate in disclosure discussions following either or both of their self-declaration and DBS check.

The process for disclosing and assessing previous convictions

Self-declaration

All shortlisted applicants will be asked to complete a self-declaration form before the interview stage. Applicants must complete these forms accurately, and reveal all relevant convictions, as well as any other information that would make them unsuitable to work with children. Failure to reveal any relevant information could lead to the withdrawal of an offer of employment.

All job application forms will include information about this requirement.

Applicants will not be asked for information about previous convictions or cautions before this stage, and any such information that is disclosed before shortlisting stage won't be taken into account in the shortlisting process.

We will store all sensitive personal data securely, only share it with relevant staff members, and destroy it securely when we no longer need it.

All our job applications and self-declaration forms go through a filtering process to promote equality of opportunity.

Self-declaration forms will be reviewed by a staff member who is not involved in making recruitment decisions, and any irrelevant information will be deleted; for example, 'protected' convictions that legally can't be taken into account.

Further disclosure discussions (see below) may be needed following safeguarding checks. A conditional offer may only be confirmed once staff are happy that any previous convictions don't

make applicants unsuitable for the role.

DBS checks

Successful candidates are subject to DBS and other safeguarding checks, as set out in statutory guidance, Keeping Children Safe in Education. Staff will consider whether:

- The checks reveal any new information that might prohibit or otherwise make a candidate unsuitable for the role, and
- The checks match any information disclosed in an applicant's self-declaration.

Further disclosure discussions (see below) may be needed following safeguarding checks. A conditional offer may only be confirmed once staff are happy that any previous convictions don't make applicants unsuitable for the role.

Disclosure discussions

Where a disclosure or the results of a DBS check reveal that an applicant is barred from the role or ineligible to be employed in that role, their recruitment process will not proceed any further, and they will be informed that they legally cannot be considered for the job.

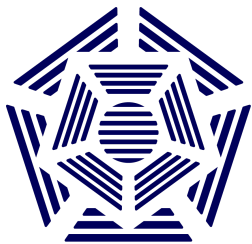
In all other cases, previous convictions will not necessarily prevent applicants from being employed by our School. Staff will determine, with support from HR specialists, whether disclosures warrant a discussion between our School and the candidate.

Where relevant, disclosure discussions will happen as part of the interview process and take the applicant's explanation into consideration. For example, we will consider:

- The seriousness of any offence and relevance to the post applied for;
- How long ago the offence occurred;
- Whether it was a one-off incident or a history of incidents;
- The circumstances around the incident, and
- Whether the applicant accepted responsibility for their actions.

Staff will then assess whether applicants' previous convictions or cautions make them unsuitable for the role.

We will not ask applicants about protected convictions and cautions.



**MORE
HOUSE
SCHOOL**
KNIGHTSBRIDGE

More House School Criminal Records Self-declaration form

As part of our duty to safeguard pupils, we need to check whether you are barred from working with children, or whether you have convictions that would make you unsuitable to work with children or in the role you've applied for.

Please complete the following form as accurately as possible.

Note: you are not required to disclose convictions or cautions that are 'protected', as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013). If you're not sure whether one of your convictions is 'protected', you can [check here](#).

If you accidentally provide information about 'protected' convictions or cautions, we won't take this into account.

How we will use this information

We'll use the information in this form to:

- Identify whether you may be ineligible for a role based on barring, a section 128 direction or childcare disqualification requirements
- Inform our conversations with you about any relevant details during the interview process
- We will not use this information to make decisions about job offers.
- If we offer you a position, we'll compare the information you've provided in this self-declaration with the information in your formal DBS check so that we only make decisions based on the most accurate information possible.

Personal Details

Name

Role you are applying for

Self-declaration

For each statement, answer yes or no	Yes/No
<p>The role you've applied for is 'regulated activity', so is eligible for a barred list check.</p> <p>Are you barred from working in regulated activity with children (i.e., are you included on the Disclosure and Barring Service Children's Barred List)?</p>	
<p>Do you have any unspent conditional cautions or convictions under the Rehabilitation of Offenders Act 1974?</p>	
<p>Do you have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020?</p>	
<p>Have you ever lived or taught overseas?</p>	
<p>Have you committed an offence overseas which would have resulted in disqualification if it had occurred in the UK?</p>	
<p>Are you prohibited from teaching?</p>	
<p><i>Only complete this question if you are applying for a managerial position (Head of Department/ Senior leader).</i></p> <p>Are you subject to a section 128 direction (prohibition from</p>	

taking part in the management of an independent school)?	
Do the police or children's social care have your name and/or information on file for any reason?	
<p>If you answered 'yes' to any of the questions above, please provide further information.</p>	

I confirm that the information above is accurate to the best of my knowledge, and that I will make the school aware of any changes in my circumstances that may affect the answers I've provided above, or my suitability for the post.

Signed:

Date: