

Policy Title:	CSS Safer Recruitment Policy
Function:	For information and guidance and incorporating the School's vision and core values. It forms part of the portfolio of policies designed to keep students safe, happy and cared for. It provides detail about the recruitment and selection procedures in place to support the Safeguarding and student welfare policy.
Status:	Statutory
Audience:	All staff
Ownership / Implementation:	The Principal has overall responsibility for ensuring that this policy is implemented.
Implementation Date:	January 2013
Review period:	Annually (or in line with new statutory guidance)
Last Reviewed:	January 2021

Safer Recruitment

1. Introduction

Compass School Southwark ("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, as outlined in the Safeguarding and Student Welfare Policy. 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.

The aims of the School's Safer Recruitment 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 safeguarding and promoting the welfare of children and young people is an integral factor at each stage of the recruitment and selection process;
- To adopt a safer recruitment process, which helps to promote a safe culture and complements other 'safety' elements such as health and safety and School security;
- To attract and recruit suitable skilled and motivated staff to help raise standards and reduce the risk to children and young people;
- To ensure that those that are responsible for each stage of the recruitment process demonstrate a professional approach by dealing honestly, efficiently and fairly with all applicants;
- To ensure that all job applicants are considered equitably and consistently;
- To ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital status, gender reassignment, pregnancy or maternity, disability or age;
- To ensure compliance with all relevant recommendations and guidance including the recommendations of the DfE in "Keeping Children Safe in Education" and the Code of Practice published by the Disclosure and Barring Service;
- To ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

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

The measures described in this policy will be applied to all who are employed to work at the School and incorporated within the scope of this policy are staff employed by contractors, supply staff, volunteers and the like who work at the School.

2. Recruitment & Selection Procedure

2.1 Advertising

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. Promoting commitment to safeguarding and child protection can act as a deterrent to would-be abusers. Thought will be given to wording, pictures and images used to ensure that they could not be considered discriminatory.

The following information will usually be included within the text of the advert:

- Name of School
- Post Title
- Hours of work
- Grade or Scale
- Salary (actual salary for part time)
- Permanent or Fixed term stating duration if fixed term.
- Brief details about what the job entails, and type of skills and experience required including responsibility for safeguarding children.
- Confirmation that an Enhanced DBS Disclosure will be required.
- Contact details
- Closing date

2.2 Applications Form

All applicants for employment will be required to complete an **Application Form** containing questions about their academic and employment history and their suitability for the role. Incomplete Application Forms will be returned to the applicant, where the deadline for completed Application Forms has not passed.

The importance of safeguarding and protecting children at the School will be promoted throughout the recruitment process in order to deter unsuitable candidates.

The School's Application Pack will normally include the following: Application Form, Job Description and Person Specification, Information Sheet about the School, the School's Equal Opportunities Policy, the School's Child Protection Policy Statement and information on an Enhanced DBS check.

A Curriculum Vitae will not be accepted in place of the completed Application Form.

2.3 Job Descriptions & Person Specification

Applicants will receive a Job Description and Person Specification for the role applied for. Job descriptions will define the purpose, duties and responsibilities of the post, as well as the

qualifications and experience needed to perform the job, with particular attention to working with vulnerable groups. The Job Description and Person Specification will refer to the School's commitment to the safeguarding of students.

2.4 Formal Interview

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

The interview will assess the merits of each candidate against the job requirements and will explore their suitability to work with children. A face-to-face interview will always be carried out as part of the recruitment process.

The Interview panel will consist of a minimum of two interviewers, one of whom will be the safeguarding representative. Where the interview is for a teaching post, the Headteacher, Deputy Headteacher or an Assistant Headteacher will form part of the interview panel. Where the interview is for a support staff post, the Headteacher or a Deputy Headteacher will form part of the selection panel.

2.5 Conditional Offer of Employment

If it is decided to make an **Offer of Employment** following the formal interview, any such offer will be conditional on the satisfactory completion of the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment;
- the receipt of at least two satisfactory references (one of which must be from the applicant's most recent headteacher/principal/employer);
- the receipt of a satisfactory Enhanced Disclosure from the Disclosure and Barring Service (DBS) and where the appointee has lived outside the United Kingdom, a certificate of good conduct (or equivalent) if applicable;
- Verification of qualifications by the individual by providing original certificates;
- Verification of professional status where required;
- Verification that the candidate has not been prohibited from teaching or carrying out teaching work by the Teaching Regulation Agency where relevant;
- Verification that the candidate has not been prohibited from carrying out management work where relevant;
- Verification of the candidate's identity; and
- Verification of the candidate's right to work in the UK.

If the offer is accepted and the above conditions are satisfied, the applicant will be issued with a **Contract of Employment** as confirmation of employment.

A record will be kept showing that the above checks have been carried out for all employees.

The details of checks will be reported to the police and/or the Disclosure and Barring Service (DBS) if: -

- The DBS disclosure shows that an applicant has been disqualified from working with children;
- An applicant has provided false information in, or in support of, his or her application; or
- There are serious concerns about an applicant's suitability to work with children gained from other legitimate information sources (e.g. references).

2.6 English Fluency

Employees working in any role that requires them to communicate with pupils, parents, guardians, staff and / or members of the community, must be able to speak fluent English to enable the effective performance of the role and to ensure that they are able to abide by their safeguarding responsibilities.

The fluency duty does not create a higher standard than already required for Teachers at the Academy who are already annually appraised against the Teachers Standards.

3. Pre-employment checks

In accordance with the recommendations of the DfE the School carries out a number of pre-employment checks in respect of all prospective employees.

3.1 Verification of Identity and Address

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

- current driving licence (including photograph) or passport or full birth certificate; and
- two utility bills or statements (from different sources) less than three months old showing their name and home address; and
- documentation confirming their National Insurance number (P45, P60 or National Insurance card); and
- documents confirming any educational and professional qualifications referred to in their Application Form.

These identification documents will also be sufficient to enable a Disclosure and Barring Service (DBS) check to be carried out.

Original documentation in respect of any specific qualifications relevant to the post (e.g. academic qualifications, vocational qualification such as the QTS or in relation to a specific subject field, First Aid or Food Hygiene) that has been entered on the application will also be required.

Where an applicant claims to have changed his/her name by deed poll or any other mechanism (e.g. marriage, adoption, statutory declaration) he/she will be required to provide documentary evidence of the change.

In all cases original (not photocopy) documents must be provided.

3.2 References

The purpose of obtaining a reference is to ensure that the School has objective and factual information to support appointment decisions. References will normally be taken up on short listed candidates prior to interview, including staff who may already be employed by the School.

All offers of employment will be subject to the receipt of a minimum of two satisfactory references, one of which must be from the applicant's current or most recent employer. If the current/most recent employment does/did not involve work with children, then the second referee should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. All referees will be sent a copy of the Job Description and Person Specification for the role that the applicant has applied for. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title/duties, reason for leaving, performance, sickness and disciplinary record;
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired); and
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people.

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.

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 before any appointment is confirmed.

4. Employment Checks

In addition to the pre-employment checks carried out above, the school carries out a range of checks once an offer of employment is made. All appointments are subject to no issues being raised as a result of these checks.

4.1 Disclosure and Barring Service Checks

Due to the nature of the work, the School applies for criminal record certificates from the Disclosure and Barring Service ("DBS") in respect of all prospective staff members, councillors and volunteers.

For posts involving contact with children or vulnerable adults, including regular caring for, training, teaching, supervising or being in sole charge of such people, an Enhanced Check with

Barred List will be required. This check will include information of all convictions, cautions, reprimands or warnings (except those which are “protected” as defined in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013) held by the Police National Computer. The Enhanced Check with Barred List will also reveal whether the individual is barred from working with children by virtue their inclusion on the lists of those considered unsuitable to work with children.

An Enhanced Check may also contain non-conviction information from local police records which a chief police officer thinks may be relevant in connection with the matter in question.

Applicants with recent periods of overseas residence and those with little or no previous UK residence may also be asked to apply for the equivalent of a Disclosure, if one is available in the relevant jurisdiction(s).

Should DBS clearance be delayed and employment commence before it is received, the School may undertake a Risk Assessment on the prospective member of staff concerned and make arrangements as appropriate for the member of staff to be paired with or supervised by another member staff who has received DBS clearance.

4.2 Volunteers, Agencies and Agency Staff

The School expects supply/temporary worker agencies/contractors that are used by the School to register with the DBS on their own account and to follow their policy or their own comparable policy.

Proof of registration will be required before the School will commission services from any such organisation.

The agency must provide evidence of the checks carried out on their central record.

The agency must also ensure that the supply staff member is aware that they have to bring in their DBS Certificate, proof of qualifications (e.g. QTS Certificate) and identification documents (proving their name, date of birth and address) on the first day of their supply work for the School.

The School reserves the right to terminate the contract with the agency and send home an agency staff member without notice should these terms of safe recruitment practice be breached by the agency or the member of agency staff. In this instance the School will not be liable for any charges connected to the booking.

All Volunteers who have direct contact with children on a regular basis will be required to have a DBS check. The Director of Business and Operations, Maggie Selman, will apply a risk assessment to assess the need for an enhanced DBS check on an individual basis.

4.3 Prohibition from teaching check

Prohibition orders prevent a person from carrying out teaching work in schools, sixth form colleges, 16 to 19 academies, relevant youth accommodation and children's homes in England. A person who is prohibited from teaching must not be appointed to work as a teacher in such a setting.

The Teacher Service system is used to carry out prohibition from teaching checks. All adults appointed to undertake any teaching role will be checked to ensure they are not subject to a prohibition order.

For school leaders, a 'section 128 direction' is also required to be carried out via the Teacher Service system to ensure that they are not prohibited from participating in the management and leadership of the school.

5. Policy on recruitment of ex-offenders

5.1 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 debar 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 in paragraph 5.2 below.

In view of the fact that all positions within the School will amount to "regulated positions" within the **meaning of the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012, all applicants for employment must declare all previous convictions, cautions, reprimands or warning (except those which are "protected" as defined in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013), including those which would normally be considered "spent" under the Rehabilitation of Offenders Act 1974.** A failure to disclose a previous conviction, caution, reprimand or warning may lead to an application being rejected or, if the failure 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.

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 a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School, 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, it will report the matter to the Police, DBS and/or the DfE National Safeguarding Delivery Unit (formerly the Teacher's Misconduct Team).

5.2 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: -

- against adults: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; and/or
- against children or adults: 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 10 years.

5.3 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 Principal of the School before a position is offered.

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

5.4 Retention and Security of Disclosure Information

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

In particular, the School will: -

- store Disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of the School's senior leadership team and the Principal's personal assistant;

- not retain Disclosure information or any associated correspondence for longer than is necessary. In most cases, the School will not retain such information for longer than 6 months although 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, the unique number issued by the DBS and the recruitment decision taken;
- ensure that any Disclosure information is destroyed by suitably secure means such as shredding; or
- prohibit the photocopying or scanning of any Disclosure information.

The School complies with the provisions of the DBS Code of Practice, a copy of which is available on request.

6. Retention of Records

If an applicant is appointed, the School will retain any relevant information provided on their application form (together with any attachments) on their personnel file. This file will be stored by the School for up to 6 years following termination of employment.

If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after 6 months unless the applicant specifically requests the School to keep their details on file.

7. Queries

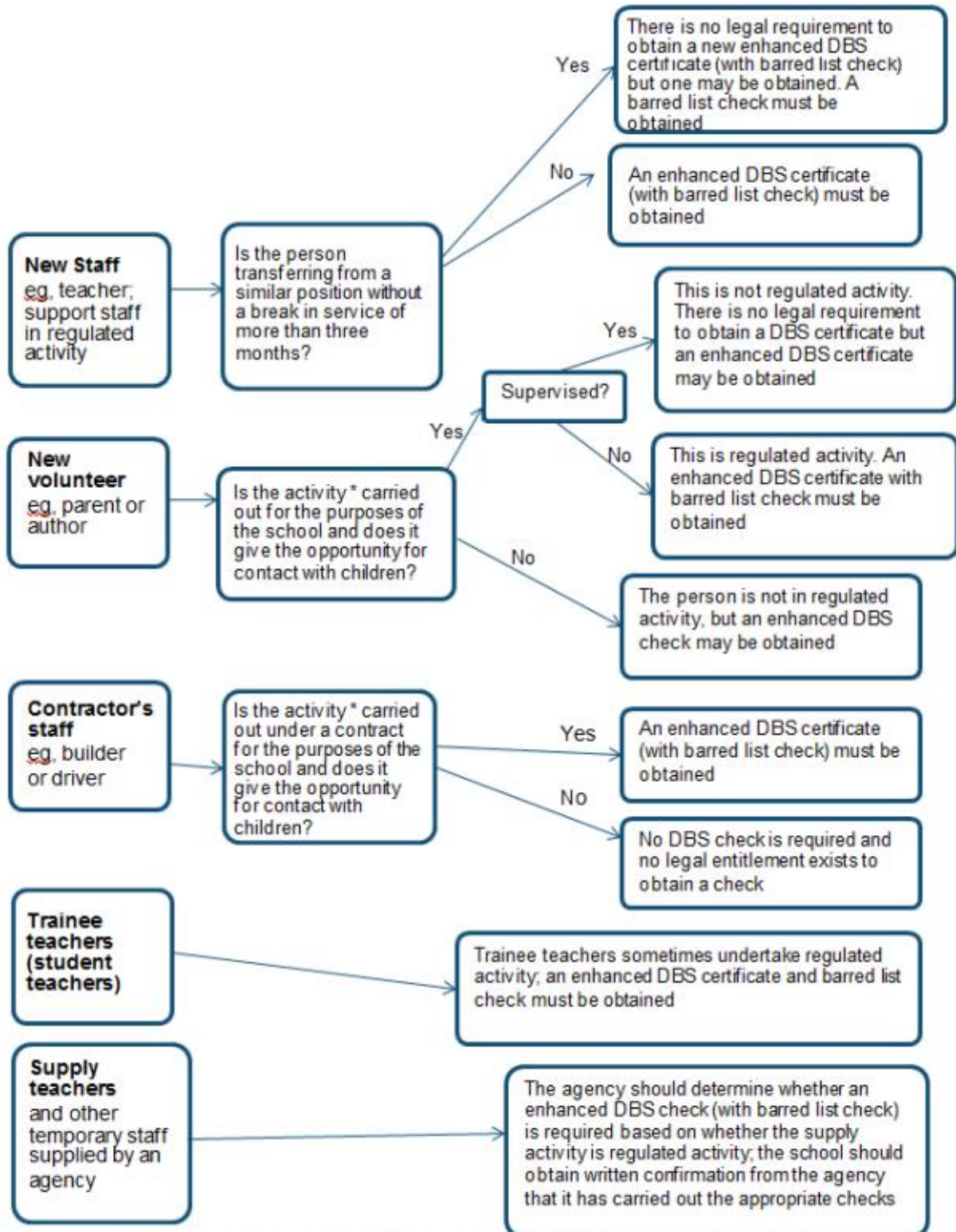
If an applicant has any queries on how to complete the Application Form or any other matter, they should contact the Principal or Business Manager.

Appendix A - CSS Recruitment and Selection Checklist

	<p>TIMETABLE DECIDED</p> <p>Job specification and description and other documents to be provided to applicants reviewed and updated as necessary. Application form seeks all relevant information and includes relevant statements about references etc.</p>
	<p>VACANCY ADVERTISED (where appropriate)</p> <p>Advertisement includes reference to safeguarding policy, i.e. statement of commitment to safeguarding and promoting welfare of children and need for successful applicant to be Enhanced DBS checked.</p>
	<p>APPLICATIONS on receipt scrutinised</p> <p>any discrepancies/anomalies/gaps in employment noted to explore if candidate considered for short listing</p>
	<p>SHORTLIST REFERENCES</p> <p>sought directly from referee on short listed candidates: ask recommended specific questions: include statement about liability for accuracy</p>
	<p>REFERENCES</p> <p>On receipt, checked against information on application; scrutinised; any discrepancy/ issue of concern noted to take up with applicant (at interview if possible)</p>
	<p>INVITATION TO INTERVIEW</p> <p>Includes all relevant information and instructions – paragraphs 3.36–3.39 (Including bringing proof of Qualifications to be copied and held on file)</p>
	<p>INTERVIEW ARRANGEMENTS</p> <p>At least 2 interviewers: panel members have authority to appoint: have met and agreed issues and questions/assessment criteria/standards. At least one must have completed Safer Recruitment Training</p>
	<p>INTERVIEW</p> <p>Explores applicants' suitability for work with children as well as for the post. N.B Identity and qualifications of successful applicant verified on day of interview by scrutiny of appropriate original documents: copies of documents taken and placed on file; where appropriate applicant completed application for CRB Disclosure</p>
	<p>CONDITIONAL OFFER OF APPOINTMENT: PRE-APPOINTMENT CHECKS</p> <p>offer of appointment is made conditional on satisfactory completion of the following pre-appointment checks and a probationary period – (Usually not less than 6 months and not More than 12 months from the date of commencement of employment)</p>
	<p>REFERENCES</p> <p>(if not obtained and scrutinised previously)</p>
	<p>IDENTITY</p> <p>(if that could not be verified straight after the Interview)</p>
	<p>QUALIFICATIONS</p> <p>(if not verified on the day of interview) and Permission to work in UK if required</p>
	<p>DBS</p> <p>Where appropriate satisfactory DBS Disclosure received (<i>risk assessment required if not immediately in place – Appendix C</i>)</p>
	<p>PROHIBITION FROM TEACHING CHECK</p> <p>To ensure a teacher is not prevented from working in a school setting</p>
	<p>SECTION 128 (for leadership appointments)</p> <p>To ensure that the leader is not prohibited from participating in the management and leadership of the school</p>
	<p>LIST 99</p> <p>Ensures the person is not prohibited from taking up the post</p>
	<p>PRE-EMPLOYMENT HEALTH CHECK</p> <p>To ensure the candidate is medically fit and/or appropriate provision is put in place to support them</p>



Appendix B – Flowchart of DBS criminal record checks and barred list checks



* Activities listed under the guidance's definition of regulated activity and which are carried out frequently

Appendix C – RISK ASSESSMENT FORM FOR STAFF AWAITING DBS DISCLOSURE



RISK ASSESSMENT FORM FOR STAFF AWAITING DBS DISCLOSURE

This form is to be completed to make an assessment about a candidates' suitability to commence employment prior to receipt of a DBS Disclosure. The risk assessment must be carried out and signed by the Principal **before** the individual commences employment.

Individuals should only be allowed to commence employment without a Disclosure if, in exceptional circumstances, following completion of a satisfactory risk assessment by the Principal, any delay is likely to severely affect service delivery.

Candidate's Name.....

Post Applied For.....

Provisional start date.....Date Disclosure check requested.....

1. Did the applicant submit a fully completed application form including, all previous employment and gaps in employment?	Yes		No	
3. Did the applicant declare any criminal convictions, bind overs, cautions, reprimands or police investigations which might lead to a conviction, orders binding them over or cautions in the UK or any other country?	Yes		No	
If yes, are these convictions relevant to the work that they are being employed to undertake?	Yes		No	
If yes, are these convictions of a serious nature i.e. offences against children / vulnerable adults / violent or sexual offences etc?	Yes		No	
If yes, please state details				
.....				
4. Did the applicant declare that they had been subject to any disciplinary investigation or action, including suspension.	Yes		No	
If yes, please state details				
.....				
5. Have you obtained references?	Yes		No	
6. Do the individual's references give any cause for concern?	Yes		No	

If yes, please state details.....			
7. At interview, did the individual say or do anything which gave cause for concern, in relation to allowing them to commence work before a Disclosure is received?	Yes		No
If yes, please state details.....			
8. Has the individual ever had a DBS/CRB/police check previously?	Yes		No
If yes, when was this done and with whom (employer)?			
9. Does the job involve regularly caring for, training, supervising or being in sole charge of children?	Yes		No
10. Will the individual be required to work alone during their induction period?	Yes		No
11. Will the individual have access to, or opportunity to commit an offence against a pupil?	Yes		No
If yes, what precautions or measures will you put in place to prevent this from happening.....			
12. Are you satisfied the risk of possible offending can be minimised by ensuring that satisfactory supervisory measures listed above can be implemented to prevent the individual from being alone with pupils?	Yes		No
13. Please outline the implications of delaying the individual in commencing employment.....			

DECLARATION BY PRINCIPAL

Please tick one of the following statements

	I have considered the questions outlined above, and I am not satisfied that it is safe to allow the above-named individual to commence to work before the Disclosure clearance is received.
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OR

	I have considered the questions outlined above and confirm that I am satisfied that it is safe to allow the above-named individual to commence work before the Disclosure clearance is received, subject to the safety measures detailed above being in place
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I confirm that I have notified relevant and appropriate school staff that the individual is still subject to clearance and of the need to ensure the above measures are implemented.

I confirm that I have explained to the individual concerned the implications of commencing work prior to clearance being received and the possibility that disciplinary action including summary dismissal may result if it is subsequently discovered that the individual did not disclose any material facts relating to their employment.

Signed.....

Print Name.....

Date.....

This form should be retained on the candidate's personal file at school, until a suitable DBS Disclosure is received allowing a decision to be made about their continuing employment.