


Earlscliffe

Senior School | Sixth Form



Safer Recruitment Policy

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1. Aims

Earlscliffe is committed to providing the best possible care and education to our students and safeguarding and promoting their welfare. We are also committed to providing a supportive and flexible working environment to all members of staff. We recognise 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 staffing process is governed by principles of non-discrimination and is designed to achieve the best match between the individual's knowledge and skills, experience and character, and the requirements of the vacant post.

Earlscliffe is committed to tackling discrimination and promoting inclusion through equality and diversity. The safety and well-being of all our pupils is our highest priority. We all share an objective to help keep children and young people safe by contributing to providing a safe environment for children, and this policy forms part of our portfolio of safeguarding policies.

The aims of this policy are:

- To set out the minimum requirements of the recruitment policy that aims to recruit and retain high-calibre staff and deter, identify and reject prospective applicants who are unsuitable for work with children or young people.
- To ensure that the best and most suitable staff are recruited on the basis of their merits, abilities and suitability for the position.
- To ensure that all job applicants are considered equally and consistently.
- To ensure that no job applicant is treated unfairly on any grounds, including age, disability, gender, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation ("protected characteristics").
- To ensure compliance with all relevant legislation, recommendations and guidance, including the statutory guidance published by the Department for Education (DfE) and any guidance or code of practice published by the Disclosure and Barring Service (DBS). This includes the Independent School Standards: Education (Independent School Standards) Regulations 2014 (ISSRs), Independent Schools' Inspectorate's (ISI) Commentary on the Regulatory Requirements, National Minimum Standards (NMS) for Boarding Schools, Keeping Children Safe in Education (KCSIE), and the Prevent Duty Guidance for England and Wales updated in April 2021 (the Prevent Duty Guidance). Together these are referred to as the 'Guidance' within this policy.
- To ensure that the College meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

2. Scope

This policy sets out the duties and responsibilities of all staff involved in the recruitment and vetting of individuals working at the school. It applies to the recruitment of all staff, governors, supply staff, contractors or volunteers or any individual working in any capacity at or visiting the school, whether on a paid or unpaid basis.

The policy applies in relation to everyone working at the school including those who may not have direct contact with children as a result of their job.

This policy does not apply to external visitors who are not engaged in work at the school. Provisions relating to visiting speakers are set out in the school's separate Visiting Speakers Policy.

3. Recruitment of Ex-offenders

The school will not unfairly discriminate against any applicant for employment based on conviction or other details revealed. The school makes appointment decisions based on merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the school. Each case will be decided on its merits in accordance with the objective assessment criteria set out in the procedure.

4. Artificial Intelligence

The school does not use artificial intelligence software as a decision-making tool at any stage of the recruitment process, including in respect of external and internal applications and promotion proposals.

5. Authorisation of Posts

Human Resources must be informed prior to any new post being advertised or vacancy filled, to ensure that all relevant regulations and legislation are complied with.

All posts (both new and replacement) must be authorised by the Headteacher to ensure consistency of employment practice and that budget requirements are met. When such authorisation is requested, it should be considered whether replacement/new post creation is indeed the best solution or whether a reorganisation of duties within existing staffing might meet the needs of the College.

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.

6. Advertising of Posts

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.

Where posts are advertised, advertisements may be internal only or published simultaneously internally and externally. The aim of advertising is to attract a wide range of high-quality candidates from diverse backgrounds. All advertisements for posts will include the following statements:

Earlscliffe is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. Candidates will be required to undergo relevant Safeguarding Checks.

This role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

A draft advertisement will be drawn up by HR and forwarded to the relevant manager or Head of Department, where it will be checked before the role is advertised.

7. Job Description and Person Specification

The attitude, behaviours required of the role, qualifications, skills, experience, knowledge, aptitudes and abilities that are essential and desirable for the post will be identified clearly in the Job Description and Person Specification. They will not include any potentially discriminatory requirements. The Job Description will also state that the individual is responsible for promoting the welfare of children and young people with whom they come into contact.

In addition, the safeguarding requirements of the role (i.e., the extent to which the role will involve contact with and responsibility for children and whether it will amount to regulated activity with children) will be stated as follows:

Support Roles:

- Whilst not in a teaching role, as [Role] you will be working on a regular basis in a school in a role which gives opportunity for contact with children. As such, you will be in regulated activity, and an enhanced DBS check (which includes children's barred list information) will be required in advance of the appointment.
- Safeguarding and promoting the welfare of children is everyone's responsibility; you will therefore be responsible for providing a safe environment in which children can learn.

Teaching Roles:

- The post will involve close contact with, and a high degree of responsibility for children and young adults. The majority of this will be regulated activity.
- Safeguarding and promoting the welfare of children is everyone's responsibility; you will therefore be responsible for providing a safe environment in which children can learn.

8. Application Form

All applicants for employment will be required to complete the College's standard application form containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will not be accepted.

The College application form includes a statement confirming that it is an offence for a person to apply to work with children if they are barred from engaging in regulated activity relevant to children. A curriculum vitae will be accepted alongside an application form but will not be accepted in place of a completed application form. Any gaps in employment history must be accounted for in the appropriate section of the application form and will be explored at interview.

At times, we use external job sites such as Kent Teach and TES. All applicants applying for a vacancy using an external job site will be required to complete an application form built into the site detailing questions about their academic and employment history and their suitability for the role. Incomplete application forms will not be accepted.

9. Shortlisting

The College will conduct a shortlisting exercise by reviewing all application forms received in order to determine which applicants will be invited for interview. The shortlisting exercise will be conducted by at least two members of staff.

Shortlisting will be based on selection criteria which assess the candidate's qualifications, skills, experience, knowledge, attitude, behaviours required for the role, aptitudes, abilities and safeguarding requirements of the role against the Job Description and Person Specification for the role.

Shortlisted Candidates are asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Candidates are asked to sign the declaration confirming that the information they have provided is true. Any declarations are discussed at the interview stage, and any concerns are explored further by the panel.

HR will carry out online searches on shortlisted Candidates prior to the interview; any issues are to be discussed during the interview.

10. References

Two written references and declarations which make specific reference to candidates' suitability to work with or near children are required (see below for internal applicants). For all staff, these should be obtained before interview, where possible, so that any discrepancies can be probed during the selection stage.

One of the two references 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 reference 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. The College will ensure that references have been completed by a senior person with appropriate authority, and if the referee is school or college-based, the reference should have been confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations.

Where necessary, previous employers who have not been named as referees will be contacted in order to clarify any anomalies or discrepancies. A written note will be kept of such exchanges.

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 for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title/duties, reason for leaving, performance, disciplinary record and sickness record (questions about health or sickness records will only be included in reference requests sent out after an offer of employment has been made and the candidate has given their expressed consent);
- 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), except where the issues were deemed to have resulted from allegations which were found to be unsubstantiated, unfounded, false or malicious.
- 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, except where the allegation or concerns were found to be unsubstantiated, unfounded, false or malicious.
- whether the applicant could be considered to be involved in "extremism" (see the definition of "extremism" in this Policy).

The College will only accept references obtained directly from the referee, and it will not rely on open references (e.g., 'to whom it may concern' references) or testimonials provided by the applicant. The College will verify the authenticity of references and ensure that electronic references originate from a legitimate source. Should a reference be taken over the telephone, a detailed note will be taken, dated and signed.

The College will confirm the referee is authorised to write the reference if completed on behalf of an organisation.

The College will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant (and, if necessary, the referee) before any appointment is confirmed

Where a reference is not received prior to interview, it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and/or the interview notes will be explored further. The applicant may be asked to provide further information or clarification before an appointment can be confirmed.

If factual references are received, i.e., those that contain limited information such as job title and dates of employment, this will not necessarily disadvantage an applicant, although additional references may be sought before an appointment can be confirmed.

The College may, at its discretion, make telephone contact with any referee to verify the details of the written reference provided, in particular to clarify content where information is vague or insufficient information is provided.

The College treats all references given or received as confidential, which means that the applicant will not usually be provided with a copy.

All internal candidates who apply for a new role at the College will have their application assessed in accordance with this procedure. References may be taken up on internal candidates as part of the application process and can be provided by colleagues, as the College will be the most recent employer and will previously have taken up references from past employers.

11. The interview Process

Shortlisted applicants will be invited to attend a formal interview at which the College will explore further the information contained in the applicant's application, discuss any information found as a result of online searches, suitability to work with children and assess their suitability for employment. It will also enable the College to deal with any questions the applicant may have about the College and the role applied for.

Interview panels will include at least one individual who has undertaken safer recruitment training. A written record of the interview will be kept.

Candidates will be asked: -

- questions relating to their attitude and motivation to work with children and young people (or in an environment where they are present).
- technical/competency-based questions.
- questions that attest to their match to the Job Description and Person Specification.
- for an explanation of any gaps in their employment history (recorded in writing), and as all shortlisted candidates will be required to complete a self-declaration form prior to the interview (in which they will be asked to provide information about their criminal records history and other factors relevant to their suitability to work with children), this information will be considered and discussed with candidates at the interview.

Earlscliffe is committed to safeguarding and promoting the welfare of its pupils. For security purposes and in accordance with the Guidance, all applicants are to provide original documentation on the interview day of the below, with a reminder of these requirements at Appendix 1 of this Policy: -

- evidence of their identity (see 'Verification of identity' paragraph 14 below);
- proof of address (see 'Verification of identity' paragraph 14 below);
- right to work in the UK, and
- any documents confirming educational and professional qualifications that are relevant to the vacancy.

Earlscliffe will ensure that reasonable adjustments for candidates with a disability or special needs are provided for at the interview, provided notification has been made in advance.

12. After Interview

If the College wishes to make an offer of employment, any such offer will be conditional on the following, as well as those checks outlined in the 'Pre-employment checks' paragraph 13 below:

- verification of the applicant's identity (see paragraph 14 below);
- verification of the applicant's employment history.
- the agreement of a mutually acceptable start date and the signing of a contract incorporating the College's standard terms and conditions of employment.
- the receipt and verification of at least two references which the College considers to be satisfactory (see 'References' paragraph 10 above).
- the receipt of an enhanced disclosure from the DBS, with barred list information where the candidate is to work in a regulated activity, which the College considers to be satisfactory.
- the receipt of a separate check of the Children's Barred List if an individual will start work in regulated activity before the DBS certificate is available.

- if the candidate has lived or worked outside the UK, any further checks the College considers appropriate (see 'Overseas criminal record check' paragraph 20 below).
- verification of the applicant's medical fitness for the role (see 'Medical Fitness' paragraph 15 below).
- verification of qualifications which the College deems a requirement for the post or which the applicant otherwise cites in support of their application.
- information about whether the applicant has ever been referred to or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency (TRA) which renders them unable or unsuitable to work at the College (see paragraph 16 below);
- information about whether the applicant has ever been referred to, or is the subject of a sanction issued by, a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at the College (see paragraph 17 below);
- if applicable, confirmation that the applicant is not disqualified from acting as a trustee/governor or senior manager of a charity under the Charities Act 2011 (if applicable, see paragraph 18 below)
- For management positions, information about whether the applicant has ever been referred to the Department for Education or is the subject of a direction under section 128 of the Education and Skills Act 2008, which renders them unable or unsuitable to work at the College (see 'Prohibition from management', paragraph 18 below);
- information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002, which renders them unable or unsuitable to work at the College.
- the college being satisfied that the individual is not "disqualified" from working in connection with early or later years provision.

13. Pre-Employment Checks

In accordance with Keeping Children Safe in Education (September 2025), the requirements of the Education (Independent School Standards) Regulations 2014 and related guidance, the school carries out a number of pre-employment checks in respect of all prospective employees.

Checks help identify whether a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). These checks are seen as part of the wider whole school safeguarding regime, which continues following appointment.

In fulfilling its obligations, the school does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age. In addition to the

checks set out below, the school reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the school.

The school's single central register (SCR) is used to record the checks undertaken for each member of staff and their outcome, as well as the checks undertaken for governors, some volunteers, contractors, supply staff and self-employed workers undertaking work at the school.

Personnel files for directly employed staff include a starter checklist to record the dates and results of the pre-employment checks.

14. Verification of identity, address, right to work in the UK and qualifications

As per the 'The interview process' paragraph above (11), all applicants who are invited to interview will be required to bring with them original documentation as evidence of their identity, right to work in the UK, original proof of address, and qualifications. The College checks the right-to-work documentation of each candidate attending the interview.

The College asks for this information at the interview to ensure that the person attending the interview is who they claim to be, that they are permitted to work for the College if appointed, and that they hold appropriate qualifications.

Identity and address: all applicants must bring with them to the interview original documents that evidence their identity and address (these requirements comply with DBS identity checking guidelines).

All applicants must always provide their birth certificate as one form of identity (unless there is good reason why this cannot be provided).

The College aims to adopt best practices, and KCSIE reinforces the importance of being aware of the potential for individuals changing their name; thus, best practice is to check any applicant's name on their birth certificate, where this is available.

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

Right to work in the UK: all applicants must also bring to the interview a valid form of evidence that confirms their right to work in the UK. Valid forms of evidence can be found in the Home Office 'Right to Work Checklist': (Right to Work Checklist (publishing.service.gov.uk)), here:

<https://www.gov.uk/government/publications/right-to-work-checklist>.

15. Medical Fitness

The College is required to verify the medical fitness of anyone to be appointed to a post at the College, after an offer of employment has been made but before the appointment can be confirmed.

The Medical Declaration 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 (such as proposed timetable, extra-curricular activities and layout of the College). If the College has any doubts about an applicant's fitness, the College will consider reasonable adjustments in consultation with the applicant. The College may also seek a further medical opinion from a specialist or request that the applicant undertake a full medical assessment with our external OH support.

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

16. Prohibition from Teaching

The College uses the Teaching Regulation Agency (TRA) Secure Access service to check whether successful applicants are the subject of a prohibition or interim prohibition order issued by a professional conduct panel on behalf of the TRA.

Teacher prohibition and interim prohibition orders prevent a person from carrying out teaching work as defined in the Teachers' Disciplinary (England) Regulations 2012 in England. Teacher prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by the TRA. Pending such consideration, the Secretary of State may issue an interim prohibition order if it is considered to be in the public interest to do so. The TRA's role in making prohibition orders and the processes used to impose them are described in more detail in the publications "Teacher misconduct: disciplinary procedures for the teaching profession" and "Teacher misconduct: the prohibition of teachers: Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession."

A person who is prohibited must not be appointed to a role that involves teaching work (as defined in the Teachers' Disciplinary (England) Regulations 2012).

We ask all shortlisted applicants for roles (whether a teaching or non-teaching role) to declare whether they have ever been referred to, or are the subject of a sanction, restriction or prohibition issued by, the Teaching Regulation Agency or other equivalent body in the UK.

Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the Teaching Regulation Agency (or other equivalent body, whether in this or another country), whether or not that resulted in the imposition of a

sanction, or where a sanction has lapsed or been lifted, the College will consider whether the facts of the case render the applicant unsuitable to work at the College.

The College applies the definition of “teaching work” set out in the Teachers’ Disciplinary (England) Regulations 2012, which states that the following activities amount to “teaching work”:

- planning and preparing lessons and courses for pupils.
- delivering lessons to pupils.
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

The above activities do not amount to “teaching work” if they are supervised by a qualified teacher or other person nominated by the Headteacher. If in any doubt or if the applicant has taught previously or may teach in the future, the check will be undertaken, including for sports coaches and peripatetic staff.

17. Prohibition from Teaching – Outside the UK

For all appointments to roles which involve “teaching work”, the College needs to be satisfied that the applicant is not subject to a sanction imposed by a regulator of the teaching profession in any country.

Therefore, the College will ask the applicant to obtain from the professional regulating authority of the teaching profession in each country in which they have worked as a teacher evidence which confirms that they have not imposed any sanctions or restrictions on the applicant and that they are not aware of any reason why the applicant may be unsuitable to work as a teacher. The College will also ask shortlisted applicants (and their referees) to disclose whether they have ever been referred to or are the subject of a sanction issued by the regulator of the teaching profession in the countries in which they have carried out teaching work.

Sanctions and restrictions issued by the regulating authority of another country will not prevent a person from working as a teacher at the College. However, the College will take all relevant information into account in determining whether an applicant is suitable to work at the College.

The College may allow an applicant to commence work pending receipt of a formal check from a particular country if it has received an additional reference and/or letter of professional standing from that country and considers the applicant suitable to start work. Decisions on suitability will be based on all of the information that has been obtained during the recruitment process. Unless expressly waived by the College, continued employment will remain conditional upon the College being provided with the outcome of the formal check and it being considered satisfactory.

If no information is available from a particular country, the College may allow an applicant to commence work if they are considered suitable based on all the information that has been obtained during the recruitment process and any additional checks that the College deems appropriate have been undertaken.

If the formal check is delayed and the College is not satisfied about the applicant's suitability in the absence of that information, the applicant's proposed start date may be delayed until the formal check is received.

18. Prohibition from Management (Section 128 Directions)

The College is required to check for the existence of directions made by the Secretary of State under s.128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts an individual from being involved in the management of an independent school (a section 128 direction).

The College will carry out checks for section 128 directions when appointing applicants into management positions from both outside the College and by internal promotion.

Section 128 directions are applicable to appointments made to the following positions, made on or after 12 August 2015: the governing body; headmaster; any teaching positions on the senior leadership team; any teaching positions that carry a departmental headship; and for nonteaching staff, management positions, such as those as part of the senior leadership team. The College will assess on a case-by-case basis whether the check should be carried out when appointments are made to teaching and support staff roles that carry additional responsibilities.

All staff employed by the College are regarded as being in 'regulated activity' for the purposes of this check.

The relevant information is contained in the enhanced DBS disclosure certificate (which the College obtains for all posts at the College that amount to regulated activity). It can also be obtained through the TRA Secure Access system. The College will use either or both methods to obtain this information.

19. Criminal Record Checks – Disclosure and Barring Service (DBS)

As an organisation using the DBS to assess applicants' suitability for positions of trust, Earlscliffe complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure based on conviction or other information revealed.

Earlscliffe actively promotes equality of opportunity for all with the right mix of talent, skills and potential and accepts applications from a wide range of candidates. The College makes appointment decisions based on merit and ability. If an applicant has a criminal record, this

will not automatically bar them from employment with the College. Each case will be decided on its merits in accordance with objective assessment criteria such as the nature of the offence, the relevance of it to the position, how long ago and at what age it was committed, any pattern of offending behaviour, the circumstances surrounding the offence including the seriousness of it or other matter revealed, whether the applicant's circumstances have changed since the offending behaviour and any other relevant factors.

At the interview or in a separate discussion, we ensure that a discussion takes place about any offences or other matters that might be relevant to the position. Failure to disclose a previous conviction (which should be declared) may lead to an application being rejected, an offer being withdrawn, or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

The College applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the College which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. (See appendix 4 for DBS Flow Chart).

All positions within the College are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those that would normally be considered "spent" except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules.

If 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 College will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Headteacher (as appropriate for the position) before a position is offered or confirmed.

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

20. Overseas Criminal Record Check

If the College does not consider the DBS certificate alone as sufficient (because it would not cover offences committed abroad), the College will require whatever evidence of checking is available from the person's country of origin (or any other countries in which he or she has

lived) before the appointment is confirmed. This may include an overseas criminal records check, certificate of good conduct, or professional references.

When requesting such information, the College has regard to relevant government guidance and will therefore always require the applicant to apply for a formal check from the country in question, i.e., a criminal records check (or equivalent), a certificate of good conduct, or obtaining a letter from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions and/or that they are aware of any reason why they may be unsuitable to teach.

The College recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances the College will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country.

The College considers the guidance previously issued by the NSPCC when deciding whether to request further overseas information from applicants, which recommends that such information should be sought from those who have lived overseas for periods of three months or more in the last ten years. However, the College recognises that the Education (Independent School Standards) Regulations 2014 do not specify that a minimum period of overseas residence is required. The college, therefore, assesses each applicant's situation on its individual facts.

The Home Office has published updated guides on checks available from different countries here: <https://www.gov.uk/government/publications/criminal-records-checks-for-overseasapplicants>.

A UK national returning after working in a foreign country is required to obtain a certificate of good conduct or equivalent from the country in question.

21. Supply Staff and Agency Workers

Teaching staff agencies engaged by the school must complete the same checks on supply teachers that the school is required to complete for its own staff. The same rule applies to other agency staff who are not engaged to carry out teaching work. The school requires written confirmation that these checks have been completed before supply teachers or agency staff can commence work at the school.

The school will independently verify the identity of teaching supply staff or agency staff and will require the provision of the original DBS disclosure certificate before they can commence work at the school.

22. Employees of Contractors or Third Parties, and Self-employed Staff

In all cases, where the school uses contractors or third parties to provide services to the school, the safeguarding requirements pertaining to the staff will be stipulated in the contract.

Individuals who are engaged to work directly with children will normally be considered to be in regulated activity and the school will require the contractor to perform all employment checks that would be required of the directly employed staff. This includes, but is not limited to, outsourced support staff such as (day) cleaning operatives and catering staff, and sports coaches.

In cases where the individual is not engaged to carry out regulated activity, but whose work provides an opportunity for regular contact with children, the school will determine the level of checks appropriate to the nature of the work the individual(s) will be carrying out. At a minimum, this will include an enhanced DBS check without Children's Barred List information.

Contractors and third parties must complete the appropriate checks for their employees. The school requires written confirmation from the contractor that these checks have been completed before the individuals can commence work at the school.

Where a contractor is unable to carry out the checks themselves, for example due to the size of their organisation, or if the contractor is self-employed, the school will be able to complete the checks.

The school will independently verify the identity and DBS certificate if not clear (so a risk assessment can be carried out) of staff before they can commence work at the school.

Please refer to Appendix 2 for details on the procedure for checking employees of third parties, and Appendix 3 for details on the procedure for checking contractors managed by the estates department.

23. 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.

24. Volunteers

The school will undertake a written risk assessment and use their professional judgement and experience when deciding what checks for volunteers, if any, are required. The risk assessment considers:

- the nature of the work with children, especially if it constitutes regulated activity, including the level of supervision,
- what the school knows about the volunteer, including formal and informal information offered by staff, parents and other volunteers,
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability, and whether the role is eligible for a DBS check, and if it is, the level of check, for volunteer roles that are not in regulated activity.

Under no circumstances will the school permit an unchecked volunteer to have unsupervised contact with pupils.

The school will request an enhanced DBS disclosure and Children's Barred List information for all volunteers undertaking regulated activity with pupils at or on behalf of the school. It is for the school to decide whether a role amounts to 'regulated activity' considering all the relevant circumstances.

Unchecked volunteers are subject to appropriate level of supervision. The school considers supervision as appropriate when:

- the volunteer is supervised by a member of staff (who is a person in regulated activity relating to children),
- the supervision is regular and day to day,
- the supervision is reasonable in all circumstances to ensure the protection of children.

It is the school's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the school for three consecutive months or more. Those volunteers who are likely to be involved in activities with the school on a regular basis may be required to sign up to the DBS update service as this permits the school to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

25. Visiting Professionals

From time to time the school will invite individuals who attend the school in connection with the pupils and who have a professional role, i.e. educational psychologists, social workers, support workers or health related professionals.

Before visiting professionals can visit at the school, the member of staff making the arrangements must ensure that they receive written confirmation from the employing body that a clear DBS check of an appropriate level has been completed.

The level of DBS check required will depend on the type of work carried out. In most instances the school will ask that an enhanced DBS check is completed. Where the activities include personal care (washing, dressing or health care), a children's barred list check must also be carried out. If visits to the school become more regular, the school may ask for additional safeguarding checks to be completed.

When a visiting professional arrives, staff must check their ID to ensure imposters do not gain access to children.

26. Visiting Speakers

Earlscliffe College has a clear procedure for ensuring that any visiting speakers, whether invited by staff or by pupil themselves, are suitable and appropriately supervised.

27. Staff on Short-term or Seasonal Contracts

Some staff, such as sports professionals or admissions interviewers do not work all year round at the school and may have a gap of employment from the school of longer than three months. When first joining, the school will carry out all recruitment checks in the same way as a permanent member of staff. When returning after a gap, an update to their employment history and medical fitness will be requested.

Those staff who are likely to be involved in activities with the school on a regular basis may be required to sign up to the DBS update service as this permits the school to obtain up to date criminal records information without delay prior to each new activity in which they participate. Where required, an updated DBS is necessary before staff can commence work at the school.

28. Governors

Checks on potential school governors will be carried out by Dukes on behalf of the school before their appointment is confirmed. These checks include:

- identity check,
- evidence of their entitlement to work in the UK (where relevant),
- evidence that the Governor has not been prohibited from participating in the management of independent schools (section 128 check),
- enhanced DBS with barred list,
- overseas check (as required),

29. Chair of Governors Checks

If the chair of governors is to change, Dukes will ensure that the Department for Education (DfE) obtains an enhanced criminal record check, and checks both the individual's identity and right to work in the UK before he/she takes up the appointment. Further overseas checks are required if the person lives or has lived outside the UK. The Chair of Governors' disclosure application must be performed by the DfE.

Dukes will ensure that these checks are completed by the DfE even if the chair of governors has previously served as school governor and checks were previously completed by the Dukes.

30. Persons Over 16 Not on the Roll at the College

In accordance with the guidance, for all persons over 16 (not on the roll of the College) who after April 2002 began to live on the same premises as boarders but are not employed by the College, there is a criminal records check completed at the Enhanced level, with a check of the children's barred list together with an appropriate written agreement between the College and those persons.

31. Pupils staying with host families

It is college policy that all homestays are arranged by families directly with host families directly; however, should the college make 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.

32. Risk Assessment & Issued DBS Certificate

No employee will be able to work alone and will be subject to a risk assessment (incorporating the appropriate level of supervision) until a suitable DBS disclosure certificate is received by the College. All appointments are subject to the continued declaration of any criminal record and failure to disclose this could lead to the termination of employment.

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to the College. It is a condition of employment with the College that the original disclosure certificate is provided to the College when received by the applicant. Original certificates should not be sent by post. Applicants must instead bring the original certificate into the College. A convenient time and date for doing so should be arranged with HR as soon as the certificate is received.

If there is a delay in receiving a DBS disclosure, the Headteacher has discretion to allow an individual to begin work pending receipt of the disclosure. This will only be allowed if all

other pre-employment checks (see paragraph 13 above), including a clear check of the Children's Barred List, where the position amounts to regulated activity, have been completed and once appropriate supervision has been put in place.

33. Data Protection, Retention and Disclosure

As part of its legal safeguarding duties, the school is required to carry out a range of pre-employment checks on all prospective employees, as detailed in this policy. In order to complete these checks, applicants and staff are required to provide specific information relevant to their role.

For successful candidates, the school will retain on their personnel file all relevant information provided during the recruitment process. This will include, but is not limited to, copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information is collected to verify the candidate's mental and physical fitness to undertake their role and may be used to meet the school obligations as an employer, e.g. to consider reasonable adjustments under the Equality Act 2010 or to address other workplace needs.

This documentation will be retained for the duration of the individual's employment and thereafter retained in accordance with the school's Retention Policy. If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after 6 months.

The same approach applies to suitability checks carried out for volunteers engaged with school activities.

34. Handling of DBS Certificate Information

The school follows the Disclosure and Barring Service (DBS) guidance on the handling of certificate information to ensure it is managed safely and confidentially. The following principles apply:

- **Storage and Access:** DBS certificate information is stored securely, in lockable, non-portable storage, with access strictly limited to individuals who are authorised to view it as part of their duties.
- **Handling:** Certificate information is only shared with those authorised to receive it. Photocopying or scanning of DBS certificates is prohibited without the explicit consent of the individual concerned.
- **Usage:** DBS information is used solely for the specific purpose for which it was requested.
- **Retention:** Once a recruitment decision has been made, certificate information (such as copies of DBS certificates) is not retained for longer than is necessary, and for a maximum of six months. This retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing

safeguarding audits. Disposal: After the retention period, all DBS information is destroyed by secure means (e.g. shredding) to prevent any unauthorised access or misuse.

Data Sharing

The school is also required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency. Failure to provide requested information may result in the school not being able to meet its employment, safeguarding or legal obligations.

The school will process personal information in accordance with its privacy notices.

35. Whistleblowing

All staff understand they are expected and encouraged to raise concerns, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during their employment in accordance with the school's policies (including the Whistleblowing Policy, the Safeguarding and Child Protection Policy and the Staff Code of Conduct).

36. Referrals to the DBS and Teacher Regulation Agency (TRA)

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

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

If the individual referred to the DBS is a teacher, the school may also decide to make a referral to the TRA

37. Responsibilities

All applicants must complete the recruitment documentation honestly and completely, declaring any relevant issue as outlined in the policy. ■

- Recruiting managers must ensure that selection processes are fair and effective, seeking advice and support from the HR team as appropriate.
- The HR team have responsibility for undertaking checks on all employees, volunteers and contractors according to the policy, and enforcing the requirements.
- Managers appointing contractors or sessional workers must ensure that details are passed to the HR team to process those checks in sufficient time.

- The designated safeguarding lead has a responsibility for ensuring that this policy and procedure meets the safeguarding needs of the school.
- The headmaster and bursar with the People Advisor, have a responsibility to fairly and consistently apply the policy and procedure to ensure fair, safe recruitment practices.
- The governors have a responsibility to ensure that statutory obligations around employment and safeguarding are reflected in this policy.

38. Appendix 1 Documents to bring to Interview

The list below is an aide-memoire for applicants, reminding them of what to bring to the interview.

Further documents may be required.

- Photographic ID which is valid (original)
 - Proof of address (original, dated within the last 3 months)
 - Birth certificate (must be provided, unless there is a very good reason)
 - Any change of name documentation
 - Any other ID and right-to-work documentation
 - Qualifications including all certificates (original)
-
- A completed self-disclosure form regarding any criminal record. Ideally this should be provided to HR in advance of the interview day itself so that the information can be provided to interviewers, together with the applicant's other documentation.
-
- If any references are outstanding (for example, for a teaching position, whereby references are required in advance), the applicant must remind their referee to send the references to HR by the interview day.

39. Appendix 2 Checks for Employees of Contractors or Third Parties, and self-employed staff

See Paragraph 22: Employees of Contractors or Third Parties, and Self-Employed Staff

No employee of third parties can start work at Emanuel without the relevant safeguarding checks being completed. The process for ensuring that appropriate checks have been carried out for all contractors and third parties is as follows:

Action	How / By whom
Inform HR and provide: <ul style="list-style-type: none"> ○ name and contact details for contractor, ○ name and contact details for the individual who is commencing work at the school, ○ proposed start date, end date, and schedule, ○ relevant details of the work they will be engaged in (e.g. coaching rugby) 	Recruiting Manager
Contact contractor for written confirmation of relevant checks, answering queries and questioning information given as appropriate.	HR
Where a DBS certificate is not clear, to view the certificate and carry out a written risk assessment.	HR
Confirm to the recruiting manager when the individual can start work.	HR
Identity and documents check on arrival	Recruiting Manager or HR
Meet the individual on their first day, before commencing work, to view any documents needed to finalise the checks.	HR (with assistance from the recruiting manager)
Where appropriate, assign safeguarding training through the school's platform	DSL or HR

40. Appendix 3 Checks for Employees of Contractors / Third Parties managed by the Estates Department

The school engages a number of contractors and third parties to undertake specialised work relating to building and maintaining the school estate. The estates director is responsible for appointing the contractor organisations and ensuring that suitable contracts are in place and the vetting of contractors complies with the school's policies and procedures.

Due to the nature of the site and the nature of building/maintenance work, contractors may have the opportunity for regular contact with children.

Under no circumstances will the school allow a contractor, on whom no checks have been obtained, work unsupervised or engage in regulated activity relating to children.

Unsupervised Work

The school requires confirmation that appropriate criminal record checks (see below) have been completed before employees of the contractor or third party can commence unsupervised work at the school. When appointing new buildings and works contractors, the estates department will ask for written and signed confirmation from the employer that appropriate checks have been completed. This confirmation must include the date of when the DBS check has been completed and if the DBS check is clear. Where a contractor is unable to carry out the checks themselves, the school will be able to complete the required checks.

Once a satisfactory confirmation has been received, employees of contractors will be added to the school's 'Approved Contractors List'. Contractors likely to work on site during term time will be required to hold an enhanced DBS (no barred list information). If they are likely to work more than 3 times within a 30-day period, an enhanced DBS with children's barred list information will be required.

Supervised Work

Where a contractor is required to work on site and is likely to come into contact with children (i.e. during term time) but is not on the Approved Contractor List, a member of the estates department will supervise the contractor. For example, to conduct an emergency repair.

The level of supervision required will be agreed by the estates manager in each circumstance, with due consideration to the opportunity for contact with children.

Out of term time, a risk assessment will be undertaken if contractors do not hold an enhanced DBS certificate and if likely to come into contact with children, they will be supervised at all times.

Type of Check	How / By whom	Timescale
Estates department engages the contractor and includes the safeguarding requirements in the contract.	Estates Manager (or delegate).	Prior to commencing work onsite.
The type of work undertaken by the employees of the contractor/third party is established.	Estates director (or delegate), in consultation with HR Director or Head of Compliance.	Prior to commencing work onsite.
Contractor is issued with a template and returns with safeguarding data complete for the employees of whom this is required.	Contractor to return form and estates director (or delegate) to check the form for any concerns.*	Prior to commencing work onsite.
*If a DBS is not clear, the certificate needs to be viewed and a written risk assessment be undertaken. Work can only commence onsite if the risk assessment has been approved by the bursar.		
Employees of the contractor to be added to the Approved Contractor List.	Estates Manager (or delegate)	On the first day of work (after ID check).
Identity of the contractor to be checked on arrival against information provided and issued a school ID card and safeguarding summary card. Photographic ID such as a valid passport, UK biometric residence permit or current UK driving licence is required. The member of the security team will add the date of the security check to the Approved Contractor List.	Estates Manager (or delegate)	On the first day of work onsite.

41. Appendix 4 DBS Flowchart (KCSIE 2025)

