



**ORWELL PARK  
SCHOOL  
Nacton,  
Ipswich  
IP10 0ER**

**SAFER RECRUITMENT  
POLICY**

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## INTRODUCTION

This policy applies to all sections of the School including the EYFS. Orwell Park School is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. This Safer Recruitment Policy draws on and supports the School's Safeguarding Policy. The School's recruitment policy and process derive from, and comply with, 3 complementary sets of legislation and guidance:

- Keeping Children Safe in Education 2022
- Boarding Schools National Minimum Standards NMS 19, September 2022
- The Education (Independent School Standards) Regulations April 2019, (in force from September 2019)

The requirements of NMS 19 must be adhered to when recruiting all staff who work with boarders after the normal daily curriculum programme finishes. Satisfactory DBS certificates must be received for all new staff who fall into this category before they are allowed to begin work. For all others, the Headmaster may authorise a new member of staff to start work prior to receipt of a satisfactory DBS disclosure providing that a satisfactory Barred List check has been completed, and a risk assessment has been conducted with satisfactory measures put in place to supervise the new member of staff; this process would be followed in exceptional circumstances.

## AIMS AND OBJECTIVES

The aim of the Safer Recruitment policy is to help deter, reject or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

The School has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to do the job at the School based on the applicant's abilities, qualification, experience and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation. If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant they must declare as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

## ROLES AND RESPONSIBILITIES

**Governing Body.** It is the responsibility of the governing body to:

- Ensure the School has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements.
- Monitor the School's compliance with them.

**Headmaster and Bursar.** The governing body have delegated responsibility to the Headmaster (teaching staff) and Bursar (support staff) to lead in all appointments. School governors may be involved in staff appointments but the final decision will rest with the Headmaster / Bursar.

**Senior Management Team.** It is the responsibility of the Headmaster, Bursar and other senior managers involved in recruitment to:

- Ensure that the School operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the School.
- Monitor contractors' and agencies' compliance with this document.
- Promote welfare of children and young people at every stage of the procedure.

## **RECRUITMENT AND SELECTION PROCEDURE**

### **Advertising**

To ensure equality of opportunity, the School will advertise all vacant posts to encourage as wide a field of applicants as possible; normally this entails an external advertisement. On occasion and for certain posts the School may consider the use of staffing/recruitment agencies for some appointments; normal recruitment checks will be applied in these circumstances.

Any advertisement will make clear the School's commitment to safeguarding and promoting the welfare of children.

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA) and GDPR.

### **Application Forms**

Orwell Park School uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history).

The application form will not include the applicant's declaration regarding convictions and working with children; such a declaration will be requested only from those candidates short-listed for interview. CVs will not be accepted as an alternative to the application form but may be submitted in addition to the application form where appropriate. Within the application form applicants will be expected to make a declaration regarding any personal association with a current employee.

All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and possible referral to the police and other professional regulatory bodies (eg. Teaching Regulation Agency (TRA); Disclosure and Barring Service (DBS)).

A form containing questions on Equal Opportunities Monitoring Information (EOMF) is included at the rear of the application form, this information is removed from the application form by the HR department prior to being considered in the selection process. Application forms (not including the EOMF) will be made available to the selected interview panel for the basis of forming questions. The interview panel members may wish to add annotations on answers and discussions during the interview and this may form part of the record of the interview process.

### **Proof of Employment History**

The School uses its own application form as proof or evidence of an applicant's employment

history, the detail of the form is subject to further scrutiny at interview and by the receipt of references and possible discussions with them by School, staff eg confirmation of dates of employment with the respective employer.

## **Job Descriptions and Person Specifications**

A job description is a key document in the recruitment process, and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role.

The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job; this may form part of the job description or be a separate document depending upon the role.

## **References**

For academic and pastoral posts, references for short-listed applicants will be requested in advance of an interview and where possible for support staff posts. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted. In such cases, this reference will be taken up immediately after interview and prior to any formal offer of employment being made. Two professional references must be provided. These will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions.

Referees may be contacted (by phone) to provide further clarification as appropriate; this practice is more routinely adopted for staff posts in regulated activity. Any discrepancies or anomalies will be followed up with the candidate.

The School does not accept open references, testimonials or references from relatives.

## **Social Media Checks**

For candidates shortlisted for interview an online search may be conducted to check for incidents that have happened that are in the public domain. The check will be noted in the personnel file contents page and if anything of note is discovered an entry will be made in the personnel file. Where the discovery is of a significant safeguarding nature it is possible that any offer of employment or invitation to interview may be withdrawn.

## **Interviews**

There will be a face-to-face interview wherever possible, and the same panel will see all the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria. Interviews will always contain questions that relate to safeguarding.

Those interviewing should agree structured questions. These should include:

- what attracted the candidate to the post being applied for and their motivation for working with children;
- exploring their skills and asking for examples of experience of working with children relevant to

the role; and

- probing gaps in employment or any frequent changes in employment or location, asking about the reasons for this.

Interviews should be used to explore potential areas of concern to determine the applicant's suitability to work with children. Areas that may lead to further probing include:

- implication that adults and children are equal;
- lack of recognition and/or understanding of the vulnerability of children;
- inappropriate idealisation of children;
- inadequate understanding of appropriate boundaries between adults and children; and,
- indicators of negative safeguarding behaviours.

Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process. Notes from the interview and any other information considered in decision making will be clearly recorded and included in the personnel file.

At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable.

### **Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status**

All applicants invited to attend an interview at the School will be required to bring at least 3 identification documents as proof of address/ identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations. Wherever possible photographic identification plus birth certificate are the preferred items for proof of identity but Valid ID documents include:

- Valid Passport
- Current Valid Driving Licence
- Marriage Certificate
- Birth Certificate
- Utility Bill/Landline Phone Bill (issued within the last 3 months)
- Bank/Building Society Statement (issued within the last 3 months)
- Credit Card Statement (issued within the last 3 months)

As proof of right to work applicants may provide a share code to be checked online via the Government website.

In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification legally required for the position and claimed in their application form.

Original documents will only be accepted and photocopies will be taken; the person taking copies must annotate them with a statement that the "originals were seen", adding initials or a signature and a date the copies were taken.

## **OFFER OF APPOINTMENT AND NEW EMPLOYEE PROCESS**

The appointment of all new employees is dependent upon the completion and receipt of satisfactory checks such as identity, right to work, DBS Certificate, Barred List (and all other required checks specific to the role). A personnel file checklist will be used to track and audit paperwork obtained in accordance with the Safer Recruitment Training. The checklist will be retained on personnel files and key data recorded in the Single Central Register (SCR).

### **The Rehabilitation of Offenders Act 1974**

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at Orwell Park School.

### **DBS (Disclosure and Barring Service) Certificate**

All staff at Orwell Park School require an enhanced DBS Certificate with barred list check and therefore a DBS Certificate must be obtained before the commencement of employment of any new employee. Details of the DBS certificate will be recorded on the personnel file check list in the personnel file of the staff member and on the school's SCR.

In cases where the DBS check has not been completed before a potential start date for a member of staff, a barred list check must be completed and a risk assessment completed for early employment, arrangements must include adequate supervision for the member of staff; such cases must be discussed with the Headmaster.

The School uses an online service provider to obtain DBS and barred list checks for school staff. The email notification of the DBS result is accepted as provisional evidence of the DBS result until the staff member presents the actual DBS certificate to the HR Department details are then recorded in the SCR as per Annex A.

Members of staff at Orwell Park School are aware of their obligation to inform the Headmaster or Bursar of any cautions or convictions that arise between these checks taking place or subsequent to employment.

Governors. On 18th March 2016 the government amended legislation to make Enhanced DBS checks mandatory for governors in all schools. Governors appointed prior to 1st April 2016 were required to obtain a DBS by Sept 2016; those appointed after Sept 2016 must apply within 21 days from appointment.

### **Portability and Duration of DBS Certificates Checks**

The DBS code of Practice, the Independent Boarding School Association and OFSTED do not specify a duration period for a DBS check and portability of DBS Certificate checks is normally conferred by the applicant registering with the DBS Update Service. For clarity, portability refers to the re-use of a DBS Certificate obtained for a position in one organisation and later used for another position in another organisation. Orwell Park School is committed to adhering to these Codes of Practice and does not accept DBS Certificates carried out by another organisation unless they are registered with the DBS Update Service or involve work at an educational establishment with no break of service or within the same LA educational area (Suffolk County Council where there has been no break of service). Where there has been a difficulty in obtaining

an enhanced DBS check ahead of a possible start date for an employee, the enhanced DBS check from a previous employer will be used until the school DBS is completed provided a barred list check is also completed and an early employment risk assessment is put in place. Portability of a DBS will be checked by the HR staff using the employers' update and checking service; from Easter 2018 a copy of the confirmation report of the DBS will be retained in the respective personnel file.

### **Barred List (formerly known as List 99)**

Before starting work all new school staff or self-employed contractors involved in regulated activity will be checked against the barred list, a list maintained by the Disclosure and Barring Service (formerly the Independent Safeguarding Authority) of individuals who are barred from working with children. The barred list check is part of the Enhanced DBS certificate check normally used by the School. If it is not possible to complete an enhanced DBS check prior to the start date of an employee, a barred list check will be completed in accordance with Annex A. The children's barred list replaces:

- List 99 (individuals barred from working in education under section 142 of the Education Act 2002)
- Protection of Children Act list (PoCA)
- Disqualification orders operated by the criminal justice system.

It is illegal for schools to employ anyone who is on the list.

### **Prohibition Orders**

All teachers and staff in regulated activity will be checked via the TRA System for the following:

- those that have failed to successfully complete their induction or probation period
- those that may be the subject of a suspension or conditional order imposed by the General Teaching Council for England (prior to abolition) that is still current
- those that are subject to a prohibition order issued by the Secretary of State.
- Those prohibited under the Childcare Regulations 2006.

### **Section 128 Direction**

The School checks, via the TRA System, that a person taking up a management position including a member of the governing body, is not subject to a section 128 direction made by the Secretary of State. Prior to Easter 2018 the Enhanced DBS was also used to complete a section 128 check by adding the annotation "management in independent school" to the application; the DBS certificate number is therefore regarded as evidence of this check. The requirement to check for prohibition from management also extends to internal promotions and this process should be completed prior to the take-up of the role.

### **Dealing with Convictions**

Once the School receives a declaration from a candidate on previous convictions or cautions, a formal procedure is followed if a DBS Certificate is returned with details of convictions. Consideration will be given by a small group consisting variously of the Headmaster plus any relevant governor or member of SMT and HR staff. The declaration from the candidate will

be considered against the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- changes in circumstances;
- de-criminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Bursar. A decision will be made following this meeting.

### **Medical Fitness**

There are certain questions the School may ask at an interview stage to determine whether applicants can undertake a function which is intrinsic to the job. Anyone appointed to a post involving regular contact with children must possess the appropriate level of physical and mental fitness before any appointment offer is confirmed. All successful applicants are requested to complete a medical questionnaire. The medical questionnaire is reviewed by HR and where appropriate additional medical advice will be sought which may include a doctor's medical report or referral to occupational health specialist.

### **Overseas checks**

All new employees who have lived outside the UK for a period greater than 3 months within the last 5 years are subject to additional checks in accordance with the Immigration, Asylum and Nationality Act 2006; a Police check or statement of good conduct from the local police authorities is required for these staff. Where it is not possible to obtain Police checks a risk assessment will be conducted and as part of additional control measures/risk mitigation extra references may be required (it is acknowledged that obtaining Police checks from some countries is particularly difficult; some individual circumstances also make it difficult to obtain the required checks or statements from local authorities). The check will be recorded in a column in the SCR.

### **Trainee/Student teachers**

DBS and supporting recruitment checks are carried out on all applicants for initial teacher training that are salaried by the School. Where trainee teachers are fee-funded, the School obtains written confirmation from the training provider that the necessary checks have been carried out.

### **Volunteers**

The School obtains an enhanced DBS certificate including barred list information for all volunteers who are working in regulated activity. Regarding volunteers who are not engaging in regulated activity but have the opportunity to come into contact with children on a regular basis (e.g. supervised volunteers), the School carries out, at least a standard DBS check and obtains a certificate as proof of this. In some cases a risk assessment may be conducted before deciding whether to seek an enhanced DBS check.

### **Contractors**

Any contractor, or any employee of the contractor, who is to work at the School, is subject to the appropriate level of DBS check. Contractors engaged in regulated activity require an enhanced DBS certificate including barred list information. For all other contractors who are not engaged in regulated activity, but whose work provides them with an opportunity for regular contact with



children, a DBS check (not including barred list information) will be required. Contractors who regularly work at school will be entered in the SCR.

### **Children Staying with Host Families**

There may not be similar checks such as are made by DBS in the UK in European countries or other countries outside Europe. Child protection systems, policies and procedures and the culture of safeguarding young people, therefore, may be very different. The organiser of any overseas residential trip where host families are being used is responsible for ensuring that suitable checks have been made, the School Policy on hosts for Pupils and host families is to be followed in these cases; where there is a need for additional guidance the DSL is to be approached. Additional information can also be found in the School trips and Visits Policy and from the EVC.

### **Induction Programme**

All new employees will be given an induction programme, which will clearly identify the School policies and procedures, including the Safeguarding Policy, and make clear the expectation and codes of conduct which will govern how staff carry out their roles and responsibilities. An induction form recording all the relevant elements must be completed for the member of staff and sent to HR for inclusion in the personnel files; this serves as evidence that this process has been completed.

### **Probationary Period**

Following the induction of a new employee into the workplace, new staff will be required to complete a probationary period; the duration of this is normally 6 months for support staff and 2 terms for academic staff but for Early Career Teachers (ECT) this will increase to 12 months. The duration of the probationary period will be specified in the contract of employment. During the probationary period the line manager of the new employee will be responsible for oversight and guidance and will be required to conduct meetings at 1 month, 3 month and 6 month intervals or as directed in the Staff Induction Policy; meetings will address progress, answer any queries, provide further guidance or make an individual aware of any concerns or shortcomings. At the end of a probationary period a letter will be written to confirm the permanent contract of an individual; where there are ongoing concerns with some aspect of performance, behaviour or attendance the probationary period may be extended or in some cases the probationary period may be deemed to have failed and in such cases the individual's contract will not be made permanent and they will be given notice of termination of contract.

### **Single Central Record (SCR)**

In addition to the various staff records kept in School and on individual personnel files, a single central register or "record" of recruitment and vetting checks is kept in accordance with the DfE requirements. This is kept up-to-date and retained by the Bursar and HR & Compliance Officer. Access to the SCR is also shared with the Headmaster and the SCR is reviewed and discussed with this group regularly; the SCR is also reviewed on occasion by the safeguarding Governor. Further details on the management of the SCR and the details to be recorded are included at Annex A to this policy.

### **Record Retention / Data Protection**

**Unsuccessful Applicants for Posts.** Orwell Park School will retain all application materials

and interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be destroyed (ie shredded). The 6 month retention period is in accordance with the School Data Protection Policy (which is in accordance with the Data Protection Act 1998 and GDPR 2018) and will also allow the School to deal with any data access requests, recruitment complaints or to respond to any complaints made to an Employment Tribunal.

**Employees Information and Data.** All information retained on employees in their P files or the Single central record is kept centrally in the Bursary in a locked and secure cabinet. Once an employee leaves employment with the school the records will be removed and placed in secure archive storage on the School site. Records of past employees (those who have resigned, retired or moved on) will be retained in the School archive in accordance with the data retention guidelines in the School Data Protection Policy; from Sep 21 records are typically held for a period of not less than 50 years after employment has ceased.

### **Ongoing Employment**

The School recognises that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. The School will therefore provide ongoing training and support for all staff, as identified through the appraisal procedure.

### **Leaving Employment at Orwell Park School**

Despite the best efforts to recruit safely there may be occasions when allegations of abuse against children and young people are raised. The Headmaster will refer all cases of suspected abuse to Suffolk's Safeguarding Children Board or the police **immediately**. The School **will not** attempt to conduct any form of investigation without the full knowledge of the relevant external agencies.

In cases of dismissal (or resignation) due to the above behaviour, the School will inform the DBS, TRA and Suffolk's Safeguarding Children Board of the circumstances why the employee is leaving the School's employment; the School will also inform the Charities Commission of any significant events.

### **Monitoring and Evaluation**

The Bursar will be responsible for ensuring that this policy is monitored and evaluated throughout the School. This will be undertaken through formal audits of job vacancies and a yearly safer recruitment evaluation audit which will be presented to the Governing Body.

### **Links to other Policies**

This policy is an important part of the School's overall approach to safeguarding and child protection and has links to the following key policies:

- Safeguarding (and Child Protection) Policy
- Staff discipline and Capability Policy
- Staff Induction Policy
- Staff Code of Conduct and staff Handbook

## **SINGLE CENTRAL REGISTER OF APPOINTMENTS – GUIDE TO COMPLETION**

### **I Background**

Orwell Park School (hereafter, the School) is required by both The Education (Independent School Standards) (England) Regulations 2010 (the **ISSRs**) and Keeping Children Safe in Education 2022 (**KCSIE**) to maintain a Single Central Register of pre-appointment checks (**SCR**). This guidance note sets out what information the SCR must contain, who must be included on it and how it must be completed to ensure compliance with regulatory requirements.

### **2 Who must be included on the SCR**

There are a number of categories of people who will work at the School. Set out below is guidance on which categories must be included in the SCR.

The ISSRs require the School to include on the SCR the following people:

- all staff who work at the School;
- all supply staff who work at the School; and
- all members of the proprietor body i.e. the Governing Body (**GB**).

<b>Category</b>	<b>Included in SCR</b>
Staff in regulated Activity	Yes
Staff not in regulated Activity	Yes
Volunteer (unsupervised)	Yes, if checks necessary
Volunteer (supervised)	Yes, if checks necessary
Supply staff	Yes
Employees of third parties	No
Contractor's involved in regulated activity	Yes
Contractor's staff not involved in regulated activity	No
Host Families	Not if private arrangement between families

NB those marked "No" may still require vetting checks

### 3 What information must be included on the SCR

Part 3 of KCSIE states that the SCR must show whether the following checks have been completed:

- Identity
- Children's Barred list/ List 99 (date of DBS check unless a separate earlier barred list check was undertaken);
- Professional qualifications;
- Enhanced DBS Disclosure (or DBS Status check if the individual is subscribed to the DBS Update Service);
- Right to work in the UK;
- Prohibition from teaching and childcare (where appropriate) check
- A section 128 (Prohibition from management) check
- Further checks on people who have lived or worked outside the UK; police check from the country in which resident for 3 months or more and/or proof of employment status.
- Proof of employment history; initially this is to be recorded as the date of signature of the application form by the candidate and from Jan 2023 this will be record as the date of receipt or scrutiny by the school.
- A check of References.
- Check of disqualification from childcare.

The School has decided to adopt a best practice approach by entering on the School's SCR all relevant checks (both statutory and non-statutory) and any relevant additional information. A list of all checks which must be recorded on the School's SCR are detailed below together with additional details. The information recorded on the SCR is whether or not each check was carried out, the date on which the check was completed (or the certificate obtained) and the initials of the member of staff who carried out the check.

- **Surname (Identity check)**
- **First name (Identity check)**
- **Address (Identity check)**
- **Date of Birth (Identity check) (in the SCR from Jun 2018)**
- **Job Title**
- **Start Date**  
The date entered on the SCR must be the date work actually starts rather than the date on which the contract of employment, or other agreement, was signed.  
**NB** ALL checks must be completed and logged on the SCR prior to a person's start date. The only exception to this is the DBS disclosure, provided it has been applied for prior to work commencing. Where a person starts work without the original DBS disclosure having been seen by the School, a separate Children's Barred List

check must have been undertaken. A risk assessment to determine whether it is appropriate for the person to start, and the level of supervision required, must have been carried out and approved before work can start (see "Comments" below).

- **Qualifications required**

Where an individual claims to hold qualifications as part of an application for a position these are checked in advance of employment and the date of the check and initials of the checker will be logged under this column.

**NB** not all appointments are subject to qualification requirements in these cases n/a will be entered.

- **Enhanced DBS disclosure**

The ISSRs require the School to undertake an enhanced DBS check on all staff (See School's Recruitment Policy). This covers nearly all appointments to the School workforce. In respect of volunteers, the School carries out a risk assessment to determine whether an Enhanced DBS check is necessary.

- Details of the DBS certificate will be recorded on the personnel file check list in the personnel file of the staff member and on the school's Single Central Register (SCR or Record); the certificate number and the date on the certificate are recorded (under Disclosure type and number column) as is the date on which it was seen or checked (under DBS check) and respectively). Once the relevant data has been recorded the certificate copy is destroyed; destruction of the certificate by HR staff is to be completed within 3 months of start date.

- **Children's Barred List**

Where the position applied for amounts to "**regulated activity**" the School obtains confirmation that the applicant is not named on the Children's Barred List. Most positions at the School will amount to regulated activity and a Children's Barred List check will therefore be carried out in nearly all cases. This check is completed as part of the Enhanced DBS check. Where an individual commences work prior to the School seeing the original DBS disclosure a separate check of the Children's Barred List must be carried out before work starts. Failure to do a separate check in these circumstances will amount to a regulatory non-compliance. If the check was completed as part of the DBS check only then the date on which the DBS disclosure was received should be the date entered in the Children's Barred List column. If a separate check was undertaken then the date on which it was carried out should be entered on the SCR. In cases where an individual starts work ahead of the receipt of an enhanced DBS, the HR and Compliance Officer will also complete checks on the TRA service including prohibition lists and overseas teaching checks where appropriate.

- **Acceptance of DBS from another institution**

In cases where a member of staff has a DBS from another institution details of the check will be recorded in the school SCR. However, the School's general policy is to carry out a new DBS check when appointing all new, permanent staff. When a

DBS is accepted from another institution this will be logged on the SCR under this column (with the DBS certificate number and the date that confirmation of the current DBS is seen and initials of the checker) with further information detailed under the comments column.

- **DBS Disclosure number**

As printed on certificate. The SCR identifies and records the date (from September 2018) and number of the original certificate obtained at time of appointment. This column also identifies that a Section 142 direction check has been detailed on the DBS certificate.

- **Overseas criminal records or certificate of good conduct**

In cases where individuals have lived or worked outside the UK, the respective staff must undergo the same checks as all other staff in schools or colleges. In line with current vetting check regulations, the School will make further checks as it in order to verify a person's suitability to work with children due to them having lived or worked overseas prior to their being appointed to a position at the School. Details of checks will be recorded in the notes column of the SCR. This is so that the School can check whether any relevant events occurred during any time spent outside the UK and consider them as part of the application process.

There is no mandatory period of time spent overseas which requires additional checks to be complete with guidance stating that "such further checks are made as the School considers appropriate having regard to any guidance issued by the Secretary of State". The HR department will assess each applicant individually (and record details on personnel files) although the School will usually undertake an overseas criminal records check if a candidate has resided overseas for a period of 3 months, or longer, in the five years prior to applying for a position at the School. In some cases it may be deemed necessary to request a criminal record check for each country in which an applicant has lived or worked for a minimum of three months since the age of 18. In addition a criminal record check from the country of nationality will be requested.

The School refers to Home Office guidance on what checks are available from different countries. Extra references are requested for applicants from countries which do not provide criminal record checks. The date of receipt of the overseas criminal records check and certificate of good conduct must be logged in this column with additional information logged under the comments column if necessary.

Extra references are requested for applicants from countries which do not provide criminal record checks. If a certificate of good conduct is requested but not received before the proposed start date then additional references (covering the period of time spent in the particular country) will be requested. These will be assessed along

with all other vetting checks to establish if the applicant is suitable to start work or whether the start date needs to be delayed until the certificate of good conduct is received. In these instances full details of any assessment will be detailed under the comments column on and the personnel file.

- **Prohibition from Teaching Check (Prohibition Order)**

This is required for anyone employed to carry out teaching work \* on or after 1 April 2012 (NB original guidance stated April 2014 but ISI Update January 2015 confirmed that "The date of 1 April 2012 is when the underlying legislation was effective and the DfE has now confirmed that this is the date from when checks should be carried out"). For teaching staff this details the date that confirmation was received from the TRA that the applicant is not subject to a prohibition order. The HR Department carries out these checks via the TRA Services' System. The date of the check is recorded in the appropriate column in the SCR.

\*Teaching work is defined to encompass: Planning and preparing lessons and courses for pupils; delivering and preparing lessons to pupils; assessing the development, progress and attainment of pupils, reporting on the development, progress and attainment of pupils. The School will carry out prohibition checks for all teachers. For those who are not employed specifically as teachers, the School will decide on a case by case basis, taking into account the individual roles, as to whether or not a prohibition check is appropriate.

- **Prohibition from Management (Section 128 Direction)**

The School will check whether applicants appointed to management positions after 12 August 2015 are subject to a Section 128 Direction. (This is a direction made by the Secretary of State under s.128 of the Education and Skills Act 2008 barring individuals from taking part in the management of an independent school).

The scope of the barring directions (as detailed in the DfE's confirmation letter of 11 August 2015) covers membership of proprietor bodies (including governors if the governing body is the proprietor body for the school), and all staff positions as follows: head teacher, any teaching positions on the senior leadership team, and any teaching positions which carry a department headship. Other teaching posts with additional responsibilities do not count as "taking part in management"). For non-teaching staff, only the Bursar is subject to checking for the existence of the barring direction.

The checks will normally be made via either the TRA services or via the enhanced DBS route. As of 11 August 2015 no directions under s.128 had been made by the Secretary of State so all those appointed prior to this date and in positions of management (as defined above) have "YES" to the check being clear entered under the relevant column. Those appointed after 12 August 2015 and in positions of management have been checked via either the DBS or TRA services' System route for a s.128 direction and have "YES" with, initials of checker and date of check entered into the respective column of

the SCR to indicate the check is clear. A “128 check” is also applicable to staff who have been internally promoted. All those not in a position of management have N/A entered.

- **Childcare (Disqualification) Regulations 2009\***

In February 2015 the Department for Education published supplementary advice to the 'Keeping Children Safe in Education' statutory guidance. The Childcare (Disqualification) Regulations 2009 place separate and additional requirements on schools to ensure that all staff working in early and later years settings are suitable to do so. The Regulations prohibit anyone who is disqualified themselves under the Regulations; disqualification will be checked as part of the enhanced DBS and prohibition checks on the TRA services process and annotated in the appropriate column; for staff where this does not apply n/a will be entered into the respective column.

- **Right to work in the UK**

In most cases this will be confirmed by provision of the appropriate physical documents a full and contemporary list of these is detailed at the Home Office website under “[Right to Work Checklist](#)”. The most common documents used (and therefore verified) as evidence of right to work in UK are UK passport, a passport proving the holder is a national of the republic of Ireland, A home office document indicating that the holder is permitted to stay in the UK indefinitely, a biometric immigration document, a birth or adoption certificate issued in the UK together with an official document with the person’s permanent national insurance number or a certificate of registration or naturalization as a British citizen together with an official document giving the persons permanent national insurance number. The government website gives guidance on these documents and also offers an online tracker to verify Home Office issued documentation like biometric residence permits. In order to record the verification process on the SCR a “YES” with, initials of checker and date of check entered into the respective column of the SCR to indicate the check has been completed. If confirmation is anything other than a UK or Irish passport then details must be entered in the comments/notes column.

- **Two references obtained\***

Two written references are required. Should the written references not be received prior to the start date then a verbal reference must be taken and logged on the SCR. The written reference must then be submitted as soon as possible and the date this is then received logged in reference column with additional information entered in the comments column. The names of referees and dates of the references must be shown in the column.

- **Social Media Checks**

For candidates where an online search has discovered something of note the check will be recorded in the personnel file contents page and a note added to



the file; an entry will also be made in the Notes column of the SCR.

- **Medical fitness\***

A declaration is required from all staff, duly signed, that they know of no reasons, on grounds of mental or physical health, why they should not be able to discharge with due care and skill the responsibilities required by the post in question. This medical declaration is made in the form of a medical questionnaire prior to appointment. In the absence of any substantive concerns precluding appointment, the date of receipt by the HR department of the questionnaire is logged under the medical column of the SCR. If there are declarations in the medical questionnaire that may cause concern, further advice may be taken and use of occupational health in order to seek specialist advice may be considered. The date of the medical questionnaire will be entered into the appropriate column of the SCR.

## **Supporting Records**

In support of the need for safer recruitment and induction of staff within the school a record of relevant training will be maintained by HR and Deputy Head Pastoral which includes the following elements:

- **Child Protection induction training carried out\***

New staff, including temporary staff and volunteers, and Governors will receive training on appointment as part of their induction, overseen by the Designated Safeguarding Lead (**DSL**), which includes: The Safeguarding (and Child Protection) Policy, Staff Code of Conduct (formerly the Code of Safe Working Practice), the identity of the DSL and Deputies, a copy of Part One of KCSIE and a copy of the Whistleblowing Code. All staff will be required to sign to confirm that they have understood this information. The CP induction training will be carried out by the DSL. The date of the induction training should be entered on the safeguarding training log under this column.

- **Confirmation of receipt of Safeguarding and Child Protection Policy and KCSIE, Part I\***

All staff sign to confirm that they have received the Safeguarding (and Child Protection) policy and KCSIE, Part I and Annex A. On receipt of the signed declaration the date of signing is logged on the training log; the dates logged relate to the issuing of the most recent version of KCSIE.

- **Safeguarding/Child Protection Training (and date)\***

Staff receive annual safeguarding and child protection training and receive regular updates as required but at least annually. It is the DSL's responsibility to ensure that all staff, teaching and support, paid and volunteers, know who the DSL, Deputy DSLs Alternates and the governor for safeguarding are, and that they receive information which enables them to identify child protection matters, regular

safeguarding training and updates and that they have understood and are acting upon the information they have been given. All new staff, teaching and support, paid and volunteers, will receive up to date safeguarding training in accordance with Suffolk County Council through the DSL and the Deputy DSLs, who have attended the Suffolk County Council 'Training-4-Trainers' safeguarding course or through outside agencies with the appropriate level of training. The date of this training is recorded on the safeguarding training log, which is maintained and reviewed regularly by the DSL and the HR Officer.

- **Child Protection Training renewal date\***  
This column indicates when an individual's Child Protection renewal training is due.
- **Prevent Duty Training\***  
All relevant staff undertake the Protecting children from radicalisation: the prevent duty training. Date of the training is logged under this column.
- **Safer Recruitment Training\***  
As per the Safer Recruitment Policy, at least one member of every appointment panel will have received safer recruitment training. In addition, any member of staff responsible for assessing pre-employment checks will have received the relevant training. The dates of Safer Recruitment Training will also be logged on the Training Log to identify which staff have received the appropriate training.

## **5 Administration of the SCR**

The regulations do not specify the required format for the register but specify that all the required columns should have suitable entries as far as this is possible. Not applicable (N/A or n/a) should be entered on the SCR if a particular check was either not relevant to the appointment in question or was not a requirement at the time of the person's appointment. The SCR should only show records for current staff.

*In accordance with GDPR and data protection laws, when staff have left the school their entry in the SCR is removed immediately (because they are no longer employed). Employee files and records are normally removed from active data systems and placed in the archive; they are retained for a period of up to 50 years (or as specified in the School Data Protection Policy) unless there are any safeguarding concerns in which case the record will be retained indefinitely.*

The SCR is held electronically as an excel spreadsheet. The Bursar and HR & Compliance Administrator are responsible for the completion and logging of entries on the SCR. School personnel authorised to access the SCR are the Headmaster and Deputy Head's.

## **6 Categories of Worker Logged on the SCR**

All staff, governors and volunteers at the School (whether in the Prep school or Pre-Prep) are recorded on the SCR. The SCR is subdivided by section to distinguish between the broad categories of staff like teaching staff, academic support staff, support staff, temporary staff, contractors providing a service to pupils (self-employed contractors including all visiting music,

sports instructors/teachers and educational specialists). Commercial contractors not normally in regulated activity or having access to pupils may be recorded on a separate sheet in the SCR or in the HR information system.

## **7 Visiting Speakers**

Visiting Speakers will be managed by the Deputy Head Teachers and will have risk assessments completed for them, where relevant the record of risk assessments will be maintained by the DSL. If it is identified that additional vetting checks are required then these will be recorded on the SCR.

## **8 Reviewing the SCR**

The School will retain the services of a specialist advisor on safeguarding and child protection, as part their annual service they will review the SCR, supporting evidence and policies. The outcome of such reviews will be reported to the Governing Body in the form of an annual report or reports as necessary. Any deficiencies or weaknesses will be remedied without delay and reported as having been rectified to the Governing Body. A member of the Governing body, normally the governor with responsibility for safeguarding, will also have access to the SCR and review it carrying out checks at least annual intervals to check compliance with this guidance document.

In addition to the specialist advice above, the School will also retain the services of an HR specialist, Bluestar HR services in order to ensure awareness and compliance with current employment law for staff.