Notting Hill Preparatory School

1.20 Safer Recruitment Policy

(EYFS & KS1-3)

Reviewer responsible:	**Bursar/HRCM**	Date of last review:	**09/16**
Reviewed by:	**CA/SCS**	Date of next review:	**09/17**

Safer Recruitment Policy

In order to ensure the safety of the children within our school it is essential that appropriate recruitment and selection procedures are followed in accordance with The Education Regulations 2014, Equality Act 2010, Protection of Freedom Act 2012, Prevent Duty Guidance 2015 and Keeping Children Safe in Education 2016 and in compliance with the Independent Schools Inspectorate – The Regulatory Requirements. Reference should also be made to the school's **Safeguarding and Child Protection** policy.

This policy has been put together and reviewed and developed over recent years to bring in more robust procedures and a tighter timeframe to comply with current best practice.

All staff on the Senior Management Team and any staff responsible for recruitment have been trained in safer recruitment. When recruiting, there is always at least one member of the interview panel who has been trained in safer recruitment.

Aims

- To protect and safeguard the children of our school community
- To establish a robust and efficient system of vetting and checking
- To maintain comprehensive centralised records of evidence of safe recruitment

Objectives

- To ensure that when a post is advertised the advertisement makes clear the School's commitment to safeguarding and promoting the welfare of children.
- To ensure the job description makes reference to the responsibility for safeguarding and promoting the welfare of children
- To ensure the person specification includes specific reference to suitability to work with children
- To obtain and scrutinise comprehensive information from short listed applicants, check on previous employment history and experience and take up and satisfactorily resolve any discrepancies or anomalies
- To verify the identity and academic or vocational qualifications of short listed applicants
- To conduct a face-to-face interview that explores the short listed applicant's suitability to work with children as well as his or her suitability for the post
- To obtain independent professional and character references that answer specific questions to help assess the preferred applicant(s) suitability to work with children and follow up any concerns
- To verify that the preferred applicant has the capacity for the job (having regard to Section 60 of Equality Act 2010)
- To check a valid Enhanced DBS certificate for the applicant (for all members of staff in regulated activity), including a barred list check where appropriate.
- To check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State or prohibition/other sanctions imposed in other EEA countries.
- To check that staff employed after 1 January 2015 to work in early years provision, and employees who are directly concerned in the management of such provision are not disqualified and that no members of their households are disqualified
- To ensure that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils.

The definition of 'staff', for the purposes of this policy, includes any person working at the school whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer. It does include teachers, peripatetic teachers, part-time staff, gap students, administrative staff, caretakers and other ancillary staff in regulated activity. Separate procedures apply for supply staff not employed directly by the school and volunteers– see below.

Single Central Register of Staff

The Human Resources and Compliance Manager (HRCM) is responsible for compiling and updating the Single Central Register of Staff. The checks included on the Single Central Register are listed at Appendix 1.

The staff responsible for making the HRCM aware of new staff /volunteers /supply staff are as follows:

- Permanent staff - members of Senior Management Team
- Temporary supply staff – Deputy Head (Admin)
- SEN staff – SENCO (OB & JCB)
- Peripatetic Music staff – Head of Music
- Sport coaches – Director of Sport
- Outside Club staff – Head of Administration
- Catering Staff – Catering Manager, Sodexo
- Volunteers – Head of Lower School (for OB), Deputy Head (Admin) (for JCB)
- Contractors – School Secretary (OB), School Secretary (JCB)
- Visiting Speakers – DSLs (OB & JCB)

All staff are responsible for ensuring the HRCM is aware of all visitors not falling in the categories above.

Procedures for recruiting staff

The procedures to be followed: **Advertising**
Drawing up a short list
The interview process
Offer of appointment
Post appointment

Advertising

- Advertisement to include statement of School's commitment to safeguarding and promoting the welfare of children
- Advertisement to indicate that applicants must request an application form
- On request, send application form, job description (which includes a requirement for compliance with the school's child safeguarding policy) and person specification

Drawing up a short list

- Application form scrutinised to ensure it does not contain any discrepancies and to identify gaps in employment – which should be noted in considering whether to short list an applicant
- All candidates to be assessed equally against criteria contained in the person specification.
- A short list of candidates will then be drawn up.
- References of the short listed candidates (open references and testimonials not acceptable) to be taken up wherever possible and a reference form sent for completion. If a reference cannot be taken up at this stage a further interview may be subsequently arranged, see below.
- Short listed candidates called for interview.

The interview process

- The interview would assess the merit of each candidate against the job requirements and explore their suitability to work with children
- Candidates for interview would be given all necessary information concerning time, place, etc. how the interview and trial lesson would be conducted and who would form part of the interview process. Any attendance requirements of the candidate will also be requested.
- Documentary evidence of identity, that would satisfy DBS requirements, and qualifications are requested
- Copies of all these will be kept on the successful candidate's personal record file. Documentary evidence of unsuccessful candidates will be shredded.

- In most instances the interviews will be conducted by two interviewers (at least one interviewer being a safer recruitment trained member of staff). An agreed set of questions will be drawn up relating to the requirements of the post and the issues to be explored with each candidate based on the information provided in the candidate's application form and references (if available). Also explored will be:
    - The candidate's attitude towards children and young people
    - His or her ability to support the school's agenda for safeguarding and promoting the welfare of children
    - Gaps in the candidate's employment history (if applicable)
    - Concerns or discrepancies arising from the information provided by the candidate or a referee
    - The candidate will be asked if he/she wishes to declare anything in light of the requirement for a DBS disclosure
- In the case of a teaching post, an agreed trial lesson will form part of the interview process and will be observed by two members of staff: one member of the interview panel and the Form Teacher or Head of Department. A teaching assistant would spend a trial morning/afternoon with a relevant Form Teacher.
- The candidate will be informed of the timeframe for announcing the outcome of the recruitment process.
- Two written references will be obtained for the preferred applicant. All referees will be asked to confirm that the applicant is suitable to work with children and that the applicant is not involved in extremism.
- A final interview of the preferred applicant will take place (if required) to investigate any discrepancies between the application form, information provided at first interview and information provided in the references.
- Where candidates live outside the UK, the interviewer must ensure that the candidate is aware that all documents required for the submission of a DBS, in particular proof of UK address, are available well in advance of their commencement of employment at the school.

Offer of appointment

Offer of appointment will be conditional on receipt of the following:

- Satisfactory DBS disclosure
- At least two satisfactory character and professional references (as appropriate)
- Check that the member of staff is not subject to a Teaching Prohibition Order (including EEA Prohibition), if appropriate
- Check that the member of staff is not subject to a Prohibition from Management of Independent Schools (section 128 direction), if appropriate
- Verification of
    - Identity
    - Medical fitness
    - Right to work in UK
    - Previous employment history
    - Proof of qualifications
    - Disqualification by Association declaration (where appropriate)
- Where applicant has lived or worked overseas, further checks will be made as appropriate.

Each new appointment will be entered on the Single Central Register by the HRCM at the time of acceptance of the job offer. The Single Central Register details all the checks undertaken, when they were undertaken and who checked them. Before anyone starts working at the School, the Head or member of the Senior Management Team, must sign a recruitment checklist to confirm there are sufficient checks and controls in place to allow them to work.

Where a DBS disclosure has not been received before the commencement of employment, a Barred List check will be carried out prior to commencement of employment. A Barred List check will also be carried out where a 'portable' DBS is used. If the new member of staff has subscribed to the D**BS** 'updating service' a status check of the individual's DBS will be carried out. No member of staff or volunteer will be left unsupervised with children until they have a satisfactory DBS. A risk assessment will be carried out in these circumstances and reviewed on a regular basis.

Procedure should there be a disclosure on DBS form: The Headmistress undertakes to discuss any matter revealed in a Disclosure with the person seeking a position at the school. Having a caution or conviction will not necessarily bar an applicant from working in the school. It will depend on the nature of the position and the circumstances, background and nature of the offence. The Headmistress should make a judgement based on the information revealed and a discussion with the candidate as to whether employing the candidate would in any way compromise his/her duty of safeguarding and protecting the children in her/his care.

Post appointment

The school conducts an Induction Inset for all staff and volunteers to:

- Provide training and information about the school's policies and procedures
- Support individuals in a way that is appropriate for the role for which they have been engaged
- Confirm safe practice and standards of conduct and behaviour expected of staff and pupils within the school
- Provide opportunities for a new member of staff or volunteer to discuss any issues or concerns about their role or responsibilities
- Enable the person's line manager or mentor to recognise any concerns or issues about the person's ability or suitability at the outset and address them immediately
- Ensure new staff are aware of the policies and procedures that relate to safeguarding and promoting the welfare and safety of children and have been given a copy of KCSIE Part One (and Annex A if appropriate);
- Are aware of the identity and role of the Designated Safeguarding Leads, and deputies.
- Have undertaken the fire safety induction.
- Raise any relevant personnel procedures, eg disciplinary, whistle blowing.
- Ensure new staff receive the Code of Conduct and an appropriate Staff Handbook and know how to access all school policies.
- Ensure that an induction form is filled out and signed by all staff.

Procedure for supply agency staff

No person may begin work in the school unless the HRCM has received written notification from the supply agency that all appropriate checks have been carried out including: identity, references, relevant qualifications where appropriate, application form/background history, medical check, an enhanced DBS disclosure, further checks if person has lived outside UK, right to work in UK, prohibition order checks, Disqualification by Association check and Barred List check.

Agencies must provide DBS checks dated in last three years for supply staff. Before a person begins work at the school (irrespective of any checks carried out by the employment business) the person's identity and DBS certificate will be checked by the School Secretaries (OB & JCB). Where a supply teacher will be at the school on a regular basis, safeguarding induction will be provided together with copies of safeguarding documentation and an induction form completed.

Procedure for recruiting Volunteers

When a parent is involved in a school activity on a supervised and 'one off' basis, such as a school trip, vetting checks would not normally be required.

If a volunteer becomes involved in a school activity on a regular basis (i.e. once a week or more, or three or more occasions in a 30 day period), the HRCM will be notified prior to the activity by the member of staff responsible. A copy of ID will be requested and held on file. An informal interview with the Head and/or member of staff involved will take place. The need for written references will be at the discretion of the Head. The volunteer will be briefed by the member of staff involved and provided (where appropriate) with safeguarding and procedural documentation. An assessment will be carried out to assess whether the volunteer will be supervised or unsupervised. The HRCM will obtain a DBS disclosure where it is considered that the role will be 'unsupervised' No volunteer in regulated activity will be left unsupervised with children until they have a satisfactory DBS. The HRCM will be responsible for keeping a list of all current volunteers who have been DBS checked and inform other members of staff accordingly.

Procedure to check visitors to the school

Visitors to the school, going beyond the Reception Area, must sign in at Reception with the School Secretary (OB & JCB) or Head of Administration. They will be given a pink visitor lanyard. The lanyard contains important safeguarding information.

Visitors should not be left unsupervised whilst on the school premises.

Visiting speakers sign in in the same way as visitors. The suitability of visiting speakers, whether invited by staff or pupils, must be approved by the Head, or Designated Safeguarding Leads (OB or JCB) and reasonable background checks made by the appropriate member of staff to decide whether to invite and/or permit a speaker to attend the School (see **Policy for Safeguarding & Child Protection** – Section 18)

Ongoing compliance procedures

All fully vetted staff must wear blue lanyards, indicating they have undergone all school safer recruitment procedures and can be left unsupervised on school premises. Anyone wearing a pink visitor lanyard should be supervised by a member of staff who has a blue lanyard. Anyone not wearing a lanyard on school premises should be challenged.

The HRCM will update the Single Central Register on a regular basis and the Bursar will review the Register regularly. Whilst DBS applications are going through the HRCM will monitor the progress of the application online. Risk assessments will also be carried out and reviewed by the Bursar on a regular basis. The Safeguarding Governor will also review the Register and carry out spot checks at regular intervals.

The HRCM will notify Heads of Department and other staff, as appropriate, when the DBS Disclosure is obtained. Staff will check and/or request from the HRCM DBS clearance for volunteers before the activity starts. Until this confirmation is received, staff must work on the basis that this clearance has not been received. The HRCM will maintain and update a register of all current volunteers with DBS checks on the SCR.

The HRCM will maintain and update the ‘Right to Work’ register. The Bursar will review this register at the start of each term. When ongoing visa applications are taking place, the register will be reviewed every two weeks.

Appendix 1 Contents of Single Central Register

NHP 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 set out below together with additional details. Those categories marked with an asterisk * are entries that are in addition to those required by the ISI.

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, where appropriate.

- **Identity including Name, Address and Date of Birth**

- **Position Description**

- **Employment Start Date**
  The date entered on the SCR is the employment contract start date as well as the date work actually started with children present.

- **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 logged under this column. Not all appointments are subject to qualification requirements.

- **Enhanced DBS disclosure**
  The School is required to undertake an enhanced DBS check on all staff in 'regulated' activity. This covers nearly all appointments to the School workforce. The date of Issue, together with the date and initials of person who checked the DBS is recorded on the SCR. Whether a disclosure is noted on the DBS is also recorded.

  There is no requirement to undertake an enhanced DBS check if, in the three months prior to beginning work at the School, the applicant has worked in another school in England in a post which brought them into regular contact with children or in any position a school since 12 May 2006 OR in a college in England in a post which involved the provision of education and regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18. The School will accept a DBS certificate (if it satisfies the above requirements) for short term, short notice staff but will carry out a separate Children's Barred List check. 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 with further information detailed under the 'further information' column. Staff applying for a DBS are encouraged to subscribe to the DBS 'updating service'.

- **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 receiving the DBS disclosure a separate check of the Children's Barred List will be carried out before work starts

- **Prohibition from Teaching Check**
  This is required for all teaching staff appointments made on or after 4 April 2014. For teaching staff this details the date that confirmation was received from the National College of Teaching and Leadership (NCTL) that the applicant is not subject to a prohibition order. These checks are carried out via the NCTL Teacher Services website. A check is carried out for all teaching staff regardless of whether the person has QTS.

- **EEA Teacher Prohibition Check**
  Since 18th January 2016 it is a requirement for EEA countries to share prohibitions and other sanctions imposed on teachers. There is a separate EEA sanction list on the NCTL Teacher Services website .This check details when and by whom the check was carried out.

- **Disqualification by Association**
  This applies to employees who work in early years provision and in relevant later years provision. Staff must sign a self-declaration form confirming that they are not disqualified from working with children and that they are not living in the same household as a person who is disqualified. This requirement came into force in early 2015.

- **Prohibition from Management of Independent Schools Directions (Section 128 directions)**
  This applies to all staff appointed to management positions (including headteachers, all staff on the senior leadership team (including non-teaching staff) and teaching positions with departmental headship) after 12th August 2015. Where staff have been recruited for such positions and subject to vetting checks before 12th August 2015, to commence in September 2015, there is no requirement to run checks again. The information is contained in the enhanced DBS disclosure certificate or obtained through the NCTL Teacher Services website.

- **Right to work in the UK**
  In most cases this will be confirmed by provision of an EEA/EU passport or current visa demonstrating right to work in the UK. If confirmation is anything other than an EEA/ EU passport then details are entered in the 'further information' column.

- **Overseas criminal records or certificate of good conduct**
  Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges (ie all those listed without an asterisk here). In addition, the School will make such further checks as it considers appropriate 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 (generally this applies if the applicant has lived overseas for 3 months or more in the last 5 years). The date of receipt of the overseas criminal records check / certificate of good conduct is logged in this column with additional information logged under the 'further information' column if necessary.

- **Two written references obtained**
  Two satisfactory written references are required. Where appropriate, one reference will be from the current or most recent employer.

- **Application Form**
  Confirmation that any gaps have been explained and checked by interviewer. Date confirmed and initials of checker are entered on 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.

- **Latest Safeguarding Training level 1 undertaken (and date)***
  Staff will receive child protection training (Level 1) that is updated regularly in accordance with the RBKC Safeguarding Children Board guidance. The date of the latest training is logged under this column on the SCR.

- **Latest Internal Safeguarding and Child Protection Induction***
  New staff, including temporary staff and volunteers, and Governors will receive training on appointment as part of their induction, overseen by the Designated Safeguarding Leads (**DSL**), which includes: The Safeguarding and Child Protection Policy, Code of Conduct, Whistleblowing Policy, the identity of the DSLs and deputies and a copy of Part One of KCSIE. All staff will be required to sign to confirm that they have understood this information. The date of the induction training is entered on the SCR under this column. Existing staff also receive

regular internal training. The date of the latest internal safeguarding training is entered in this column.

- **Confirmation of receipt of KCSIE, Part 1 & Annex A***
  This confirms the date of receipt of the latest version of KCSIE, Part 1 & Annex A to each member of staff.

- **Receipt of Safeguarding & Child Protection documents***
  All staff are required to confirm that they have received and read all the relevant safeguarding and child protection documents and know the location of all school policies. This is the latest date they signed the form to confirm this.

- **Level 3 Child Protection Training***
  This identifies those members of staff (the Designated Safeguarding Leads and deputies) who have undertaken Level 3 Child Protection Training and the date the qualification expires.

- **Safer Recruitment Training***
  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 individuals who have received the appropriate training and the date the Safer Recruitment training expires is logged on the SCR.

- **Further Information**
  The 'Further Information' column will include additional relevant comments, eg changes in role, original DBS/CRB information, overseas checks information, notes of Risk Assessments put in place.

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) 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 shows records for current staff, as well as volunteers & agency supply staff. Once staff have left employment, the records are moved to the bottom of the SCR and then removed from the SCR after one year for data protection purposes.

The SCR is held electronically as an excel spreadsheet and the HRCM is responsible for the completion, updating and logging of entries on the SCR.

Different tabs are identified for the following categories of workers:

- **NHP Employees**

- **External Staff**
  Including peripatetic music teachers, clubs staff and SEN staff who are not employed by the School.

- **Catering Staff**
  Staff supplied by Sodexo

- **Supply agency staff**

- **Governors and Chair of Governors**

- **Volunteers**
  Includes parent volunteers and work experience students

- **Other**

Out of hours cleaners or contractors who do not work during school hours

Reviewing the SCR

A member of the Governing body will review entries and check the SCR regularly to check compliance with this guidance document. The outcome of such reviews will be reported to the Governing Body. Any deficiencies or weaknesses will be remedied without delay and reported as having been rectified to the Governing Body.