

# Staines Preparatory School



## **Safer Recruitment and Selection Policy**

(Including Leaving Employment & Exit Interview)

### **September 2023**

## INTRODUCTION

This policy applies to all sections of the School including EYFS.

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in education. Staines Preparatory School is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, the school expects all staff and volunteers to share this commitment. The School is committed to a thorough and consistent Safer Recruitment Policy.

## AIMS AND OBJECTIVES

The aims of the Safer Recruitment Policy are 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 policy and the practical implementation of recruitment and selection processes also aim to meet all legislative requirements and any statutory or other guidance that may from time to time be issued in order to keep children safe.

The aims of the School's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (**DfE**), Keeping Children Safe in Education – (September 2022) (KCSIE), Disqualification under the Childcare Act 2006 (**DUCA**), the Prevent Duty Guidance for England and Wales (last updated in April 2021) and any guidance or code of practice published by the Disclosure and Barring Service (**DBS**); and
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

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

The 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 the job at the school based on the applicant's abilities, qualifications, knowledge, experience and merit as measured against the job description and person specification. All vacancies will be posted on the Staines Preparatory School website [www.stainesprep.co.uk](http://www.stainesprep.co.uk), as well as more broadly as appropriate

Existing members of staff are encouraged to apply for vacant posts if they possess the appropriate qualifications, experience and skills for the role.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation and relevant safeguarding legislation and statutory guidance (including KCSIE 2023 and Prevent Duty Guidance).

If a member of staff involved in the recruitment process has a personal or familial relationship with an applicant they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

The School aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for vacancies at Staines Preparatory School.

If an applicant makes the School aware, at any stage of the recruitment process, that they have a disability then reasonable adjustments must be considered to ensure the applicant is not disadvantaged by the process.

Throughout employment at the School, all staff are expected to disclose any convictions, cautions, court orders reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the School).

## **ROLES AND RESPONSIBILITIES**

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 Department for Education (DfE) guidance and legal requirements.
- Monitor the school's compliance with them.

It is the responsibility of the Headmistress, Bursar and other Managers involved in recruitment to:

- To ensure that at least one member of the interview panel is Safer Recruitment trained.
- 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, in line with ISI requirements
- To monitor contractors' and agencies' compliance with this document.
- Promote welfare of children and young people at every stage of the procedure.

The governing body has delegated responsibility to the Headmistress (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 Headmistress/ Bursar. However, the appointment of the Head, Deputy Head or Bursar (or equivalent) is the responsibility of the Board of Governors. All appointments are reported to the Governing Body.

## **RECRUITMENT AND SELECTION PROCEDURE**

**Please see Appendix 1 for Recruitment Checklist**

**Please see Appendix 2 for Safer Recruitment Checklist**

### **Advertising**

When advertising roles, we will make clear:

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

### **Application forms**

We will only accept application forms. Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

## **Shortlisting**

Our shortlisting process will involve at least 2 people from The Senior Leadership Team and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- The School will consider including online searches on the candidate name and key identifiers (e.g. home town) on google, social media and LinkedIn to identify any past incidents or issues which are publicly available online.

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

For further information and advice regarding self-declaration of criminal records please [click here](#) or contact Citizens Advice.

## **Seeking references and checking employment history**

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

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headmistress as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

## **Interview and selection**

When interviewing candidates, we will:

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

## **Pre-appointment vetting checks**

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

## New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available See Appendix 3
- Verify their mental and physical fitness to carry out their work responsibilities (Medical Checks)
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

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

## Existing staff

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

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

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

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

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

### **Contractors**

It is our school policy that we do not allow one off / short term contractors carrying out Maintenance or repairs to work unsupervised while pupils are on site, regardless of whether they have a DBS certificate. We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **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.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Governors**

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

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

The chair of the board will have their DBS check countersigned by the secretary of state.

All Governors will also have the following checks:

A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

## **Induction Programme**

Induction is an extension of the recruitment process and will apply on commencement of employment. A general Induction Programme is required for all new recruits.

The induction programme will include, for all, information on professional standards and boundaries in respect of child protection and safeguarding and promoting health, safety and welfare of pupils. References will be made to statutory requirements and/or local guidance in these areas. i.e. DfE documents:

- 'Keeping Children Safe in Education 2023'
- 'Working together to Safeguard Children 2018'
- Staines Preparatory School policies, procedures and practices adhering to the Staff Behaviour Policy.
- Peripatetic teachers and other supply workers, including agency workers and volunteers will receive information and guidance to enable them to carry out their temporary work in accordance to statutory requirements, alongside Staines Preparatory School policies, procedures and practices essential to their role.

## **Single Centralised Register of Members of Staff**

In addition to the various staff records kept in school and on individual personnel files, a single centralised record of recruitment and vetting checks is kept in accordance with requirements of the Education (Independent School Standards) Regulations 2014. This is kept up-to-date and retained by the Assistant Business Manager and regularly checked by the Bursar and Headmistress. The single centralised Register will contain details of the following:

- All employees who are employed to work at the school including: teachers, Learning Support Assistants, part-time staff, administrative staff, caretakers and other ancillary staff.
- All employees who are employed as supply staff to the school whether employed directly or through an agency;
- All others who have been chosen by the school to work in regular contact with children. This will cover volunteers, work placements, Governors, peripatetic staff and people brought into the school to provide additional teaching or instruction for pupils but who are not staff members eg: sports coaches etc.

The Safeguarding Governor will be responsible for auditing the Single Centralised Register termly and reporting his/her findings to the full Governing Body during the Summer Term meeting.

## **Record Retention / Data Protection**

The School is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application the School will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help the School to discharge its obligations as an employer e.g. so that the School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issues.

This documentation will be retained by the School for the duration of the successful applicant's employment with the School. All information retained on employees is kept centrally in the Assistant Bursar's office in a locked and secure cabinet. The personnel records of all staff members will be retained for a minimum of 7 years after they have left the employment. However, where a member of staff has been the subject of an allegation(s) the record will be retained at least until the accused has reached normal retirement age or for a period of 10 years if that is the longer. Consideration is given to retention of files based on prevailing advice.

Details of allegations that are found malicious will be removed from personnel records. However, for all other allegations a clear and comprehensive summary of the allegation, how the allegation was followed up and resolved and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The record will be retained until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

All written records of interviews, application forms and reasons for non-appointment will be kept by the School for 6 months, unless a longer period can be justified by the Headmistress. After which time the notes will be confidentially destroyed (i.e. shredded). Records will be treated as confidential and kept for no longer than necessary in accordance with the Data Protection Act 2018.

### **Ongoing Employment**

Staines Preparatory 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 Annual Review/appraisal procedure.

### **VISITING SPEAKERS**

The Prevent Duty Guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

A log is kept of all visiting speakers to the school, alongside a completed risk assessment which considers the suitability of the material for the age of the audience, signed off by the Headmistress or DSL. The risk assessment and log can be found on the Staff Drive.

The school is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the School or perform any other regular duties for or on behalf of the School.

All visiting speakers will be subject to the School's usual visitors signing in protocol. This will include signing in and out at Reception, the wearing of a visitors badge at all times and being escorted by a fully vetted member of staff between appointments.

The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite/or permit a speaker to attend the School. In doing so the School will always have regards to the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

*"Extremism" is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in the Country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations".*

In fulfilling its Prevent Duty 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 disability or age.

### **Safe Culture and on-going vigilance**

It is never sufficient to assume that a safer recruitment and selection process and robust induction arrangements are enough to ensure that the pupils are safe and that there is no risk to them within the educational environment. Creation of a safe culture, with on-going vigilance is essential.

Staines Preparatory School will continue to strive to create and maintain a safer culture by:

- Having in place, and putting into practice, clear policies and procedures and ensuring that all members of staff, workers, volunteers, peripatetic teachers and Governors are aware and understand them.
- Setting acceptable standards of behaviour.
- Having in place clear procedures for reporting concerns, ensuring that all staff members and workers know what their responsibility is for them.
- Taking concerns seriously and providing support to individuals raising them.
- Taking appropriate action to concerns raised.



- Ensuring robust and appropriate induction arrangements are in place
- Ensuring that all staff members and workers undertake child protection and other relevant training on a regular basis.

### **Leaving Employment at Staines Preparatory School**

Despite the best efforts to recruit safely there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. 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 for a position at the School despite being barred from working with children; or
- Has been removed by the School from working in a regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

In cases relating to the behaviour of an employee (these behaviours are within the context of four categories of abuse (i.e.: physical, sexual and emotional and neglect) the School's Child Protection policy must be followed. The School always follows LADO's advice (Local Authority Designated Officer). The School's Disciplinary Policy will apply. In cases of dismissal (or resignation) due to the above behaviour, Staines Preparatory School will inform the DBS (Disclosure Barring Service), the Surrey Children's Safeguarding Unit and will consider informing the TRA (Teaching Regulation Agency) of the circumstances why the employee is leaving Staines Preparatory School's employment.

### **Exit Interviews**

Where possible, Exit interviews are conducted with departing employees, just before they leave. The Headmistress will interview the support staff and the Bursar will interview all teaching staff. From the School's perspective the primary aim of the exit interview is to learn reasons for the person's departure, on the basis that objective feedback is a helpful driver for the Schools improvement. This is also an opportunity for the School to assess and improve all aspects of the working environment, culture, processes and systems, management and development. Exit interviews provide direct indications as to how to improve staff retention.

### **Breaches of policy**

Any instances of this policy not being adhered to will be taken very seriously and appropriate disciplinary action will be taken. Any complaint in relation to this policy, including its application will be managed through the Staines Preparatory School complaints policy or grievance policy (for existing staff members).



## Safer Recruitment Pack

1.	Safer Recruitment Pack – Contents
2.	Recruitment checklist
3.	Recruitment Privacy Notice
4.	Recruitment, Selection and Disclosures Policy and Procedure
5.	Advertisement wording
6.	Job Description form
7.	Letter in response to expression of interest
8.	Application form
9.	Equal Opportunities Monitoring form
10.	Application and Recruitment Process Explanatory note
11.	Policy on the recruitment of ex-offenders
12.	Invitation to interview letter
13.	Self-Declaration form
14.	Reference request form
15.	Interview checklist form
16.	Offer of post letter
17.	Health questionnaire
18.	Rejection letter
19.	Policy on Recruitment of Proprietors, Governors, Trustees and Volunteers
20.	Letter to volunteers
21.	Visiting Speaker Policy
22.	Visiting Speaker checklist and risk assessment



## RECRUITMENT CHECKLIST

Action	Date	Completed by please initial
Advertisement placed		
Send to Applicant: <ul style="list-style-type: none"> <li>• Application form</li> <li>• Equal Opportunities Monitoring form</li> <li>• Job Description</li> <li>• Person Specification</li> <li>• Child Protection Policy Statement</li> <li>• Application and Recruitment Process Explanatory note</li> <li>• Recruitment Privacy Notice</li> </ul>		
Received from Applicant: <ul style="list-style-type: none"> <li>• Completed Application form</li> </ul>		
For shortlisted candidates only, consider carrying out an online search		
Letter Invitation to Interview, including Self-Declaration Form		
At least two reference requests sent (ensure references for internal candidate are requested and followed up)		
References followed up over telephone (including school where last worked) and electronic references verified as coming from legitimate source		
Interview with written outcome  Record kept of reasons for any gaps in employment		
Identification documents received (including name, address, and D.O.B.) (please copy and place on file)  Hard copy of signed Self-Declaration Form		
Evidence of right to work in the UK		
Qualifications		
Rejection letter sent		

Conditional offer made.		
Sent to Applicant: <ul style="list-style-type: none"> <li>• DBS Disclosure form</li> <li>• Contract of Employment</li> <li>• Health Declaration &amp; Questionnaire</li> <li>• Self-Declaration Form</li> </ul>		
Health Declaration signed		
Health Questionnaire		
Health enquiries made of referees		
DBS check received and satisfactory		
Barred list check received and satisfactory (where appropriate)		
Where appropriate, verification of any award of Qualified Teacher Status, completion of teacher induction or probation		
If the candidate is undertaking a senior management role as set out in the Recruitment, Selection and Disclosures Policy and Procedure, a signed "senior charity manager positions: automatic disqualification declaration"		
If the candidate is undertaking a leadership role, evidence that the candidate is not prohibited from participating in the management of independent schools.		
Prohibition Order check (for a candidate to be employed as a teacher)		
<b><i>For all applicants who have worked or been resident overseas:</i></b> Such further checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing the School with proof of his/her past conduct as a teacher in the form of a letter of professional standing from the professional regulating authority in the country in which s/he has worked		
Confirmation received that the applicant is not disqualified from providing childcare under the Childcare (Disqualification) Regulations 2018. <b>OR</b> Receipt of a signed Self-Declaration form showing that the candidate is not disqualified from providing childcare under the Childcare (Disqualification) Regulations 2018.		
Check single central register completed		

APPENDIX 3

