

THE CITY OF ROCHESTER SCHOOL
SAFER RECRUITMENT, SELECTION AND DISCLOSURE POLICY AND PROCEDURE

In City of Rochester School, the term 'staff' is inclusive of all staff and it also applies to students on placement, contractors, agency staff, volunteers, the Trustees and Board of trustees.

Monitoring and Review: This policy is subject to continuous monitoring, refinement and audit by the Headteacher. The Trustees will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay.

Signed:

Date Reviewed: April 2024

Date of Next Review: April 2025

Version No.7



Alicja Emmett
Headteacher



Kirstine Boon
Chair of Trustees

This policy will be reviewed no later than November 2024, or earlier if changes in legislation, regulatory requirements or best practice guidelines so require.

Legal Status: Complies with Part 6, paragraph 32 (3)(a) of the Education (Independent School Standards) (England) (Regulations currently in force).

Applies to all:

- activities undertaken by the school inclusive of those outside of the normal school hours and away from the school site;
- who, work, volunteer or supply services to our school - that is all staff (teaching and support staff), students on placement, the Trustees and volunteers working in the school.

1) Introduction: City of Rochester School is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff. The School recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment. The aims of the School's 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, 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 2020) (**KCSIE**), the Prevent Duty Guidance for England and Wales 2015 (the **Prevent Duty Guidance**) and any guidance or code of practice published by the Disclosure and Barring Service (**DBS**);

- to comply with Part 4 of the Education (Independent School Standards) (England) (Amendment) Regulations, with reference to the appointment of the Proprietor, all staff, external providers and volunteers inclusive of completion of the Single Central Record (otherwise referred to as the Centralised Register) 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.

2) Recruitment and selection procedure:

*All applicants that receive an offer or confirmed appointment will have the associated documents/checks completed based on the role they will be undertaking (For a full list of these documents/checks please see appendix 7).

All applicants for employment, including members of the Board of Trustees, will be required to complete an **application form** containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. Should there be any gaps in academic or employment history, a satisfactory explanation must be provided. A curriculum vitae will not be accepted in place of the completed application form.

Applicants will receive a job description and person specification for the role applied for. When there is a vacancy application forms, job descriptions and person specifications are available to download from the School's website and can be printed and forwarded to applicants on request. The safeguarding child protection policy is on the School website.

The applicant may then be invited to attend a **formal interview** at which his / her relevant skills and experience will be discussed in more detail. If it is decided to make an offer of employment following the **formal interview**, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment;
- verification of the applicant's identity (where that has not previously been verified);
- the receipt of at least two references (one of which must be from the applicant's most recent employer) which the school considers to be satisfactory.
- for positions which involve "teaching work", information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the TRA (formerly NCTL) which renders them unable or unsuitable to work at the school;
- where the position amounts to "regulated activity" (see Appendix 5 below) confirmation that the applicant is not named on the Children's Barred List*.
- information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at the school;
- for applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at the school;
- where the position amounts to "regulated activity (see Appendix 5 below) the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory;
- for management positions, information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at the school;

- confirmation that the applicant is not disqualified from working with early or later years provision (if applicable, see Section 8);
- verification of the applicant's medical fitness for the role (see Section 3);
- verification of the applicant's right to work in the UK;
- any further checks which the school decides are necessary because of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references; and
- verification of professional qualifications which the school deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).
- The Teachers Services' system will be used to verify any award of qualified teacher status (QTS) and the completion of teacher induction or probation.
- If shortlisted an online search will be completed. See Appendix 6.

The school is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The school is required to conduct an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, the school can also conduct an enhanced DBS check on a person who would be conducting regulated activity but for the fact that they do not conduct their duties frequently enough i.e., roles which would amount to regulated activity if conducted more frequently. Whether a position amounts to "regulated activity" must therefore be considered by the school to decide which checks are appropriate. It is however likely that in nearly all cases the school will be able to carry out an enhanced DBS check and a Children's Barred List check.

- 3) **Medical fitness:** The School is legally required to verify the medical fitness of anyone to be appointed to a post at the school, **after** an offer of employment has been made but **before** the appointment can be confirmed. It is the school's practice that all applicants are asked to confirm their fitness to conduct the role on their application form.

Successful applicants will be required to sign a declaration of medical fitness confirming that there are no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the role. If an applicant prefers to discuss this with the school instead, or to attend an occupational health assessment to consider their fitness for the role, they should contact the Headteacher so that appropriate arrangements can be made.

This information will be reviewed against the Job Description and the Person Specification for the role, together with details of any other physical or mental requirements of the role i.e., proposed timetable, extra-curricular activities, layout of the school etc. If the Headteacher has any doubts about an applicant's fitness the school will consider reasonable adjustments in consultation with the applicant. The school may also seek a further medical opinion from a specialist or request that the applicant undertakes a full medical assessment.

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

- 4) **Pre-employment checks:** An offer of appointment will be conditional and all successful candidates will be required to:
- Verify their identity;
 - Provide contact details for all references covering 3-5 years;
 - Obtain an enhanced DBS certificate (including barred list information for those engaged in regulated activity) and receive satisfactory clearance;
 - Present the original DBS certificate within 5 days of receipt for review before they commence their post or as soon as practicable afterwards;

- Register their new DBS certificate to the DBS update service;
- Provide proof of professional status;
- Provide original certificates of relevant and required professional qualifications;
- Confirm fitness to carry out responsibilities required by the role.
- Provide proof of right to work in the UK;
- If successful candidates have worked/lived abroad they must provide a certificate of good conduct from the foreign country they worked. For more information on this, please refer to <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants> (Note it is the individuals responsibility to provide this information);
- All Teachers and any support staff whose posts fall within the remit of the Teacher Prohibition Order will be checked against the relevant restricted list, prior to recruitment and a monthly basis once employment commences:
- Persons appointed to a post involved in the management of a school (management position as an employee, trustee of the Charity or governor with delegated management responsibilities) will have a section 128 direction check completed prior to recruitment;
- Teachers that have worked abroad may be able to provide proof of their past conduct as a teacher issued by the professional regulating authority in the country in which they worked. Where available, this evidence should be considered alongside other information obtained through other pre-employment checks to help assess their suitability;

All checks will be:

- Confirmed in writing;
- Documented and retained on the personnel file in line with the Trust's data retention requirements;
- Recorded on the School's Single Central Record;
- Followed up if they are unsatisfactory or if there are any discrepancies in the information received.

Employment will not commence until all checks and procedures have been satisfactorily completed.

5) Verification of identity and address

All applicants who are invited to an interview will be required to bring with them evidence of identity, right to work in the UK, address and qualifications as set out below and in the list of valid identity documents at Appendix 4 (these requirements comply with DBS identity checking guidelines):

- one document from Group 1;
- two further documents from either of Group 1, Group 2a or Group 2b, one of which must verify the applicant's current address and
- original documents confirming any educational and professional qualifications referred to in their application form.

Where an applicant claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change. The School asks for the date of birth of all applicants (and proof of this) in accordance with KCSIE. Proof of date of birth is necessary so that the School may verify the identity of, and check for any unexplained discrepancies in the employment and education history of all applicants. The School does not discriminate on the grounds of age.

- 6) **References:** References will be taken up on short listed candidates prior to interview where possible. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the school. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend. References will always try to be obtained in writing. Where electronic references are received, the school will ensure they originate from a legitimate source. The school will obtain at least 3 years' worth of references but will endeavour to obtain 5 years.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism" (see the definition of "extremism" at Section 16).

All referees will be sent a copy of the job description and person specification for the role for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title / duties, reason for leaving, performance, attendance and disciplinary record;
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be false, unsubstantiated or malicious;
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people, except where the allegation or concerns were found to be false, unsubstantiated or malicious;
- whether the applicant could be involved in "extremism" (see the definition of "extremism" at Section 16).

The school will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials. The school will compare all references with any information given on the application form. References will be scrutinised and any concerns, discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed. The school may at its discretion make telephone contact with any referee to verify the details of the written reference provided and ask for further clarification as appropriate, for example if the answers are vague or if insufficient. Any information about past disciplinary action or allegations that are disclosed will be considered carefully when assessing the applicant's suitability for the post (including information obtained from the Teacher Services' checks referred to previously). Further help and advice can be found on the Advisory, Conciliation and Arbitration Service (ACAS) website.

In providing references for our own staff, if there was a safeguarding case in which an allegation against the member of staff was proven to be false, unsubstantiated or malicious, this would not be included in employer references.

- 7) **Criminal records check and DBS filtering rules:** Prior to 29 May 2013 an enhanced disclosure contained details of all convictions on record (including those which are defined as "spent" under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. It could also contain non-conviction information from local police records which a chief police officer considered relevant to the role applied for at the School. Since 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The DBS and the Home Office have developed a set of filtering rules relating to spent convictions which work as follows:

- a) **For those aged 18 or over at the time of an offence:** An adult conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:
- eleven years have elapsed since the date of conviction;
 - it is the person's only offence; and
 - it did not result in a custodial sentence.

It will not be removed under any circumstances if it appears on a list of "**specified offences**" which must always be disclosed. If a person has more than one offence on their criminal record, then details of all their convictions will always be included. A caution received when a person was aged 18 or over for an offence committed in the United Kingdom will not be disclosed if six years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

- b) **For those aged under 18 at the time of an offence:** A conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:
- five and a half years have elapsed since the date of conviction;
 - it is the person's only offence and
 - it did not result in a custodial sentence.

Again, the conviction will not be removed under any circumstances if it appears on the list of "specified offences", or if a person has more than one offence on their criminal record. A caution received when a person was aged under 18 for an offence committed in the United Kingdom will not be disclosed if two years have elapsed since the date it was issued and if it does not appear on the list of "specified offences".

- c) **The list of "specified offences" which must always be disclosed:** This contains many offences, which includes certain sexual, violent and other offences that are considered so serious they will always be disclosed, regardless of when they took place or of the person's previous or subsequent criminal record. The list of "specified offences" can be found at: <https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminalrecord-check>

Applicants are not required to disclose a caution or conviction for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules (see Section 7). Applicants must not ask for information about spent convictions from any member of their household. For the avoidance of doubt the school does not require applicants to request any criminal records information directly from the DBS. The school only requires applicants to provide relevant information about themselves.

The school applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the School which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of the school will amount to "regulated activity" if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the "period condition", meaning four times or more in a 30-day period; or
- provides personal care, or health care (including helping a child eat, drink, washing, dressing)
- provides the opportunity for contact with children.

Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis. It is for the school to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances. However, nearly all posts at the school amount to regulated activity. Limited exceptions could include an administrative post

undertaken on a temporary basis in the school office outside of term time or voluntary posts which are supervised.

The DBS now issues a DBS disclosure certificate to the subject of the check only, rather than to the school. It is a condition of employment with the school that the **original** disclosure certificate is provided to the school within 5 days of it being received by the applicant. Original certificates should not be sent by post and should be brought into School by the Applicant. A convenient time and date for doing so should be arranged with HR as soon as the certificate has been received. Applicants who are unable to attend at the school to provide the certificate are required to send in a certified copy, signed by a solicitor, by post or email within five days of the original disclosure certificate being received, being sent to: Mrs A Emmett (Headteacher). Where a certified copy is sent, the original disclosure certificate must still be provided prior to the first day of work. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the school.

If there is a delay in receiving a DBS disclosure the Headteacher has discretion to allow an individual to begin work pending receipt of the disclosure certificate. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once appropriate supervision has been put in place.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants may also be asked to provide further information, including a criminal record check from the relevant jurisdiction(s), a certificate of good conduct and / or references from any employment held. Work can only commence once the overseas information has been received and only if the school has considered that information and confirmed that the applicant is suitable to commence work at the school.

The Home Office has published guidance on criminal checks for overseas applicants and guidance on employing overseas trained teachers. This can be accessed via the www.gov.uk website.

N.B. Overseas checks must be completed prior to an individual commencing employment.

DBS Update Service – Employment and continued employment with the Organisation is conditional upon the registration and continued registration with the Disclosure and Barring Service update service, [DBS Update Service - GOV.UK \(www.gov.uk\)](http://www.gov.uk). Staff are responsible for maintaining their registration on the update service including paying the annual subscription fee.

With the exception of volunteers not involved in regulated activity (see Appendix 5), this would be at the discretion of the Headteacher*.

Staff are required to provide the Organisation with confirmation of their registration before commencement of employment. The City of Rochester School will then carry out a check on an annual basis thereafter. Results of these checks are stored in a secure online area in accordance with the schools GDPR policy.

If their registration to the Disclosure and Barring update service lapses and a new DBS needs to be conducted, staff will be responsible for all costs involved as well as suspended/restricted duties until the new DBS certificate and DBS update registration is in place.

*Any persons deemed unnecessary to be registered to the DBS update service will be required to undergo a new DBS application check every 3 years.

- 8) Prohibition from teaching check:** The School is required to check whether staff who carry out "teaching work" are prohibited from doing so. The school uses the Teacher Regulation Agency (TRA) system to check whether successful applicants are the subject of a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the TRA.

The school also carries out monthly checks using the Teacher Regulation Agency (TRA) system on all relevant staff and the details of which, are kept separately within the Single Central Register Folder (Hardcopy) and a secure online area in accordance with the schools GDPR policy. This check is carried out by a member of the HR team.

In addition, the school asks all applicants for roles which involve "teaching work" (and their referees) to declare in the application form whether they have ever been referred to, or are the subject of a sanction, restriction or prohibition issued by, the TRA or other equivalent body in the UK. If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual who works at the school, immediate action will be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work. We would not employ, not allow an existing member of staff to continue working with children including teaching work should a teaching prohibition order, or an interim prohibition order be issued.

It is the school's position that this information must be provided to fully assess the suitability of an applicant for a role which involves "teaching work". Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the TRA (or other equivalent body) whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, the school will consider whether the facts of the case render the applicant unsuitable to work at the school.

The school carries out this check, and requires associated information, for roles which involve "teaching work". In doing so the school applies the definition of "teaching work" set out in the Teachers' Disciplinary (England) Regulations 2012 which states that the following activities amount to "teaching work":

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

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

At City of Rochester School, all staff would fall into this category under our bespoke curriculum with wider support/welfare team delivering various lessons/interventions to all pupils across the school site.

From 1 January 2021, following the UK's exit from the EU, professional regulators in the EEA (EU, Iceland, Liechtenstein and Norway) will no longer share information about sanctions imposed on EEA teachers with the Teaching Regulation Agency (TRA). The TRA will therefore no longer maintain a list of EEA teachers with sanctions.

The school is required to seek information from an individual's criminal history from their country of origin or in which they have been working and/or travelling. The individual must provide a certificate of good conduct (or similar) from the relevant authorities. It is often sensible and most time effective for the individual to apply for/obtain this from the country prior to returning to the UK as it sometimes needs to be requested in person.

9) Prohibition from management check: The School is required to check whether any applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent School (a **section 128 direction**). This check will be made via the Teaching Regulation Agency (TRA). This check applies to appointments to the following positions made on or after 12 August 2015:

- Headteacher;
- teaching posts on the senior leadership team;
- teaching posts which carry a departmental role;
- support staff posts on the senior leadership;

- departmental budget holders, if not fallen into one of the above categories and
- a trustee, governor or proprietor that retains or has been delegated any management responsibilities.

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

In addition, the school asks all applicants for management roles to declare in the application form whether they have ever been the subject of a referral to the Department for Education, or are subject to a section 128 direction or any other sanction which prohibits, disqualifies or restricts them from being involved in the management of an independent School.

It is the school's position that in order to fully assess the suitability of an applicant for a management role it must be provided with the above information. Where an applicant is not currently prohibited from management but has been the subject of a referral to, or hearing before, the Department for Education or other appropriate body whether that resulted in the imposition of a section 128 direction or other sanction, or where a section 128 direction or other sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.

A person who discloses information which appears to disqualify them from working in a relevant role may apply to Ofsted for a waiver of the disqualification. The school may withdraw an offer of employment at its absolute discretion, with guidance and is under no obligation to await the outcome of an Ofsted waiver application. If a waiver application is rejected the school will withdraw the conditional offer of employment.

The school will securely destroy any information which is provided by an applicant which is not relevant to the childcare disqualification requirements as soon as it is established that it is not relevant. Where a person appointed to a role at the school is found to be disqualified, the school will retain any relevant information only for the period it takes for a waiver application to be heard and the decision communicated to the school, after which it will be securely destroyed.

After making this declaration staff in a relevant role are under an on-going duty to inform the school if their circumstances change in a way which would mean they subsequently meet any of the criteria for disqualification. Any failure to disclose relevant information now, or of a future change in circumstances, will be treated as a serious disciplinary matter and may lead to the withdrawal of a job offer or dismissal for gross misconduct.

The school will also carry out monthly checks on all staff within management positions. At the City of Rochester School this includes SLT, Phase Leaders, Form Tutors and any other budget holders. The details are kept separately within the Single Central Register Folder (Hardcopy) and a secure online area in accordance with the schools GDPR policy. This check is carried out by a member of the HR team.

10) Recruiting Staff from Abroad - Skilled Worker Visa: From 1 January 2021, as a result of leaving the European Union (EU), free movement with the EEA is no longer possible and a new immigration system applies equally to both EU/EEA and non-EU/EEA citizens who wish to work, live or study in the UK. This means that EU/EEA nationals arriving in the UK from 1 January 2021 onwards will need a visa to live and work in the UK. Irish citizens will continue to be able to enter and live in the UK as they do now.

From 1 January 2021, the visa type required is called a 'Skilled Worker visa' and it requires the employer to sponsor the individual for a specific role and visa. The new system is genuinely a points-based system and an applicant has to receive a minimum of 70 points which they get through:

- Being sponsored
- The role being at the appropriate skill level
- Meeting the English Language requirement

- Meeting the required salary level

11) Supply and agency staff: Agencies who supply agency staff engaged by the school must complete the same checks for their employees that the school is required to complete for its staff. Again, the School requires written confirmation that these checks have been completed before an individual can commence work at the school. The school will independently verify the identity of **supply staff or staff supplied by** an agency in accordance with section 4) above and will require the provision of the original DBS disclosure certificate before **supply** or agency staff can commence work at the school.

12) Contractors/Consultants: Contractors and consultants who are required to access the school building during school hours are either required to supply a 'Letter of Assurance' (See appendix 8, Form 4; Unregulated contact or Form 5; Regulated contact) or are escorted by a member of staff at all times.

13) Trainee/student teachers: Where applicants for initial teacher training are salaried by the school, we will ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including barred list information) will also be obtained.

Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. The school will obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children.

14) Existing staff: If the school has concerns about an existing staff member's suitability to work with children, the school will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the school moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity must be carried out. In addition, any staff member who has been absent for a period of 12 weeks or more – for example on maternity leave, will be required to go through clearances/checks. These checks will be carried out as if the person were a new member of staff. The school has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and the individual has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left.

15) Volunteers: The School will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of the school (the definition of regulated activity set out in Appendix 5 will be applied to all volunteers). The school will request an enhanced DBS disclosure without Children's Barred List information on all volunteers who do not undertake regulated activity. This is likely to be because their volunteering duties are subject to regular, day to day supervision by a fully checked member of staff or by a volunteer who the school has deemed appropriate to supervise and ensure the safety of those pupils in their care. Under no circumstances will the school permit an unchecked volunteer to have unsupervised contact with pupils. It is the school's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the school for three consecutive months or more.

Those volunteers who are likely to be involved in activities with the school on a regular basis may be required to sign up to the DBS update service as this permits the School to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates (see also section 7). In addition, the

school will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):

- formal or informal information provided by staff, parents and other volunteers;
- character references from the volunteer's place of work or any other relevant source and
- an informal safer recruitment interview.

16) Visiting speakers and the Prevent Duty: 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. 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 visitor's protocol. This will include signing in and out at Reception, the wearing of a visitor's 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 and / or permit a speaker to attend the school.

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 this 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. The school reserves the right to obtain such information on any other person appointed to work for or at the school.

17) Adults who supervise children on work experience: Where City of Rochester School organises work experience placements for its pupils, or should pupils organise their own work experience placements through the school, we will ensure that the placement provider has policies and procedures are in place to protect children from harm, this includes Barred list checks by the DBS on some people who supervise a child under the age of 16 on a work experience placement. The school will consider the specific circumstances of the work experience. Consideration will be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations would include whether the person providing the teaching/training/instruction/supervision to the pupil on work experience will be:

- unsupervised themselves; and
- providing the teaching/training/instruction frequently (more than three days in a 30-day period)

If the person working with the pupil is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. If so, the school will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person. The school is unable to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience.

If the activity undertaken by the child on work experience takes place in a 'specified place', such as a school or college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity. In these cases, and where the child is 16 years of age or over, the work experience provider will consider

whether a DBS enhanced check should be requested for the child/young person in question. DBS checks cannot be requested for children/young people under the age of 16.

18) Policy on recruitment of ex-offenders

a) Background: The School will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. The school makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the school. Each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph b) below. All positions within the school are exempt from the provisions of the Rehabilitation of Offenders Act 1974.

All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules (see Section 7). A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for the school to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the school. The school will make a report to the Police and / or the DBS if:

- it receives an application from a barred person;
- it is provided with false information in, or in support of an applicant's application; or
- it has serious concerns about an applicant's suitability to work with children.

b) Assessment criteria: In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the school will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the applicant.

If the post involves regular contact with children, it is the school's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any of the following offences:

- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the school's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud. If the post involves some driving responsibilities, it is the school's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years or other serious motoring offences considered inappropriate by the School.

c) Assessment procedure: In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the school will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by Headteacher of the School before a position is offered or confirmed. If an role is offered or confirmed the Risk assessment will be held within the applicants red SCR folder. If

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

19) Retention and security of disclosure information: The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information. In particular, the school will:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of the school's senior management and HR team;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months. The school will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken; ensure that any disclosure information is destroyed by suitably secure means such as shredding; and
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

a) **Retention of records:** 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 issue.

This documentation will be retained by the school for the duration of the successful applicant's employment with the school. It will be retained in accordance with the school's retention of records policy after employment terminates. If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months. The same policy applies to any suitability information obtained about volunteers/contractors/agency staff and trustees involved with school activities.

20) Whistleblowing and exit interviews: All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the school's policies (including the whistleblowing policy, the safeguarding policy and the Staff code of conduct). Safeguarding children is at the centre of the school's culture and is accordingly considered formally during staff performance development reviews and appraisal and finally at an exit interview which are held with all leavers.

21) Referrals to the DBS and Teaching Regulation Agency (TRA): This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks the school also has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence;
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left because they have harmed, or pose a risk of harm to, a child and

- the individual has applied for a position at the school despite being barred from working with children. If the individual referred to the DBS is a teacher, the school may also decide to make a referral to the TRA.

22) Queries: If an applicant has any queries on how to complete the application form or any other matter they should contact the Headteacher.

Appendix 1 – Single Central Record (SCR)

The school maintains an electronic single central record of pre-appointment checks, referred to in the Regulations as the register. Our single central record covers all staff, including teacher trainees on salaried routes, supply staff (see KCSIE paragraph 152) who work at the school and the proprietor, Trustees and contractors (see appendix 7). The bullet points below set out the minimum information that is recorded in respect of staff members. The record indicates whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check, a barred list check, an enhanced DBS check/certificate, a prohibition from teaching check;
- a section 128 check (for management positions for independent schools);
- A minimum of two previous employment references along with a 'Fitness to work' declaration;
- a check of professional qualifications, where required and a check to establish the person's right to work in the United Kingdom.
- further checks on people who have lived or worked outside the UK; this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions described in section 10;

All persons entered into the Single Central Register would be placed under one of the following categories-

- Teacher
- Support Staff
- Agency Staff
- Consultant
- Governor & Trustee-Regulated
- Governor & Trustee-Unregulated
- 3rd Party Contractor
- Volunteer-Regulated
- Volunteer-Unregulated

In addition, we record whether the person's position involves 'relevant activity', i.e., regularly caring for, training, supervising or being solely in charge of persons aged under 18. For supply staff, or third party, we also include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.

Whilst there is no statutory duty to include on the single central record details of any other checks, we also record other relevant information. For example, checks for childcare disqualification and volunteers.

Safeguarding and safer recruitment training dates are also logged but held separately within our systems.

We also record the name of the person who carried out each check. Although we do not need to retain copies of DBS certificates in order to fulfil our duty of maintaining the single central record, we may choose to hold copies of these, but this will be for no longer than six months. Any copies of other documents used to verify a successful candidate's identity, right to work and required qualifications will be kept in their personnel file. Individuals who have lived or worked outside the UK will undergo the same checks as all other staff in the schools. In addition, the school will make any further checks we feel appropriate so that any relevant events that occurred outside the UK can be considered.

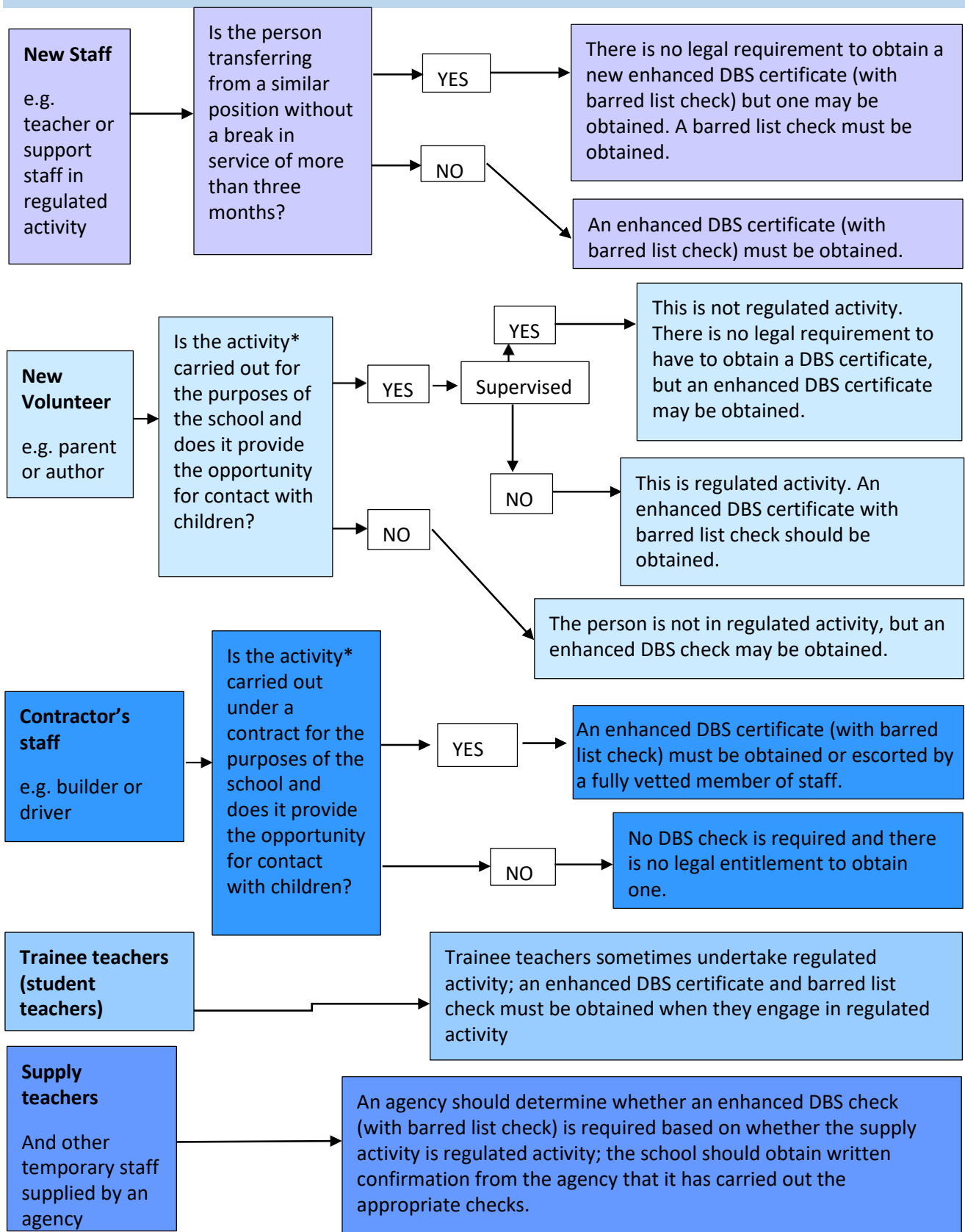
Monthly Sampling takes place as follows:

1. Safer Recruitment Personnel Check: A monthly check of a sample of personnel files against the Single Central Register. This will always include new staff. Numbers will vary as it depends on recruitment for the period. The Headteacher carries out this check together with the Assistant Head who is responsible for managing the Single Central Register. The Headteacher signs to say this check has been carried out. Actions are identified, logged and taken forward by the Headteacher.

2. Single Central Register Check: A monthly check of a sample of staff, recorded on a monitoring sheet. The Assistant Head, who is responsible for managing the Single Central Register carries out this check together with the Operations Manager. The Assistant Head signs to say this check has been carried out. Actions are identified, logged and taken forward.
The Headteacher will cross check the Single Central Register Check – They will monitor this and sign to say this has been completed.

The Chair of Trustees responsible for safeguarding will quality assure these records and talk to all personnel involved during safeguarding monitoring activities which take place six times per year.

**APPENDIX 2:
FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS**



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

Appendix 3:

Example Safeguarding Questions

The ability to ask questions that probe deeper and get beneath superficial answers is a skill that takes time to develop and practice. Those who wish to deceive are practiced in the art of deception. They may rehearse model answers to questions about safeguarding or areas of their past and it is essential that the asked unpick these responses so that there can be confidence in the validity of the answers. In an interview for a school-based post you should always ask questions about safeguarding, regardless of the role's level of contact with children. All school staff and volunteers will have a responsibility for the protection of children.

You will need to ask safeguarding questions aimed at assessing the candidate's attitude toward safeguarding children. This should be the same questions for all candidates and should be **open** to gather up as much information as possible. You should then **probe** the candidate's response to investigate the validity of the answer.

– clarifying ambiguities, expanding upon any issues, or challenging any areas – your probes are likely to be different for each candidate depending on their responses.

Closed questions should be used sparingly but can be useful if you just want to clarify or confirm something that the candidate is saying. Hypothetical questions can be useful if the candidate cannot draw on real life experience, but they are likely to elicit a **hypothetical** answer, which is not necessarily what the candidate would do in that actual situation.

Past behaviour is often the best indicator of future performance! Be aware that the child protection cases should be handled confidentially and sensitively. You do not need to ask the candidate for the exact details of a case you might be talking about – you are trying to assess their attitude, motivations and actions, so you can ask about what they did in that situation and how they handled it. Below are examples of questions designed to examine a candidate's attitude towards safeguarding children, and some positive (the kind of things you hope they would say) and negative (things that might ring alarm bells) indicators.

1. Positive. Constructive. Convincing responses with good ideas on how to apply the theory.	2. Responded well. Good knowledge of the theory with some application into practice.	3. Lack of detailed understanding. Unconvincing responses.	4. Unable to respond constructively. Negative responses.
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Questions	Positive Indicators	Negative indicators
Motivation for working with children		
<ul style="list-style-type: none"> • What attracted you to teaching/this post/at school? • How well do you think your own childhood may have influenced your own practice? How? Why? What is the impact/result? • Tell us about your interests outside of work. • What motivates young people? 	Genuine interest in the education and welfare of children. Understanding of children's needs and expectations. Self-awareness of impact on others. Strong examples of own experiences dealing with children in an appropriate and developmental manner.	Wanting role to meet own needs at the expense of children's needs. Inappropriate language when talking about children. Weak or vague examples of past experiences. No self-awareness. Emotional immaturity.

Questions	Positive Indicators	Negative indicators
Understanding of child protection principles		
<ul style="list-style-type: none"> • What do you think are the professional challenges facing school staff today? Have you experienced any of these? How did you deal with them? What do you do to avoid them? • What would you do if you were concerned about a colleague's behaviour towards children? • What makes a school a safe and caring place? How have you contributed to this? • What policies are important to support a safe environment? Why are these important? • What are staff's responsibilities in protecting children? • Tell us what you have done to actually improve child protection in the workplace 	<p>Awareness of child protection principles.</p> <p>Up to date knowledge of legislation and current policies and practices. Strong examples of own experiences of developing/strengthening/embedding child protection policies and/or practices. Proactive and committed to safeguarding – sees it as part of the day job, not an 'add-on'.</p> <p>Prepared to challenge working practices and colleagues if necessary. Willingness and eagerness to work with others to improve safeguarding.</p>	<p>No awareness or appreciation of child protection principles or current legislation.</p> <p>Weak or vague example of past experiences or involvement in child protection issues.</p> <p>Passive approach to safeguarding – only paying 'lip service' to it.</p> <p>Unwilling to challenge practice and procedure, or to make changes where necessary.</p> <p>Reluctance to work and share practice with others.</p>

Question	Positive Indicators	Negative Indicators
Boundaries and inappropriate behaviour		
<ul style="list-style-type: none"> • Give an example of where you have had to deal with bullying behaviour between pupils. What was the result? Who did you involve? What was the impact on other children? How did you know? • Give an example of where you have managed poor pupil behaviour. <ul style="list-style-type: none"> • Young people can develop 'crushes'. How would you deal with this? Have you had experience of this? How would/do you avoid this? • Give an example of how you have responded to challenging 	<p>Self-awareness of impact on others.</p> <p>Awareness of appropriate boundaries and behaviour.</p> <p>Appreciation of the differences in levels of appropriateness when dealing with adults and children. Appreciation of the challenges involved with working with children. Strong examples of own experiences dealing with difficult or vulnerable situations in an appropriate manner. Self-management when dealing with difficult or emotional situations.</p>	<p>Unclear about boundaries with children.</p> <p>Using inappropriate language when talking about children. Weak examples of past experience dealing with difficult or vulnerable situations.</p> <p>No appreciation of the importance of boundaries are children's needs.</p> <p>Lack of self-awareness or self-management techniques when dealing with difficult or vulnerable situations.</p>

Question	Positive Indicators	Negative Indicators
Boundaries and inappropriate behaviour		
<p>behaviour. How did it affect you emotionally? Why did you respond in that way? What impact did it have on the learning impact with other pupils/you?</p> <ul style="list-style-type: none"> • When do you think it is appropriate to physically intervene in a situation involving young people? • How do you define an appropriate staff-pupil relationship? • Give examples of what you would consider to be appropriate and inappropriate behaviour between or toward staff and pupils. • Tell us about how you have dealt with a child with 'difficulties'. 		

Appendix 4: List of Valid Identity Documents

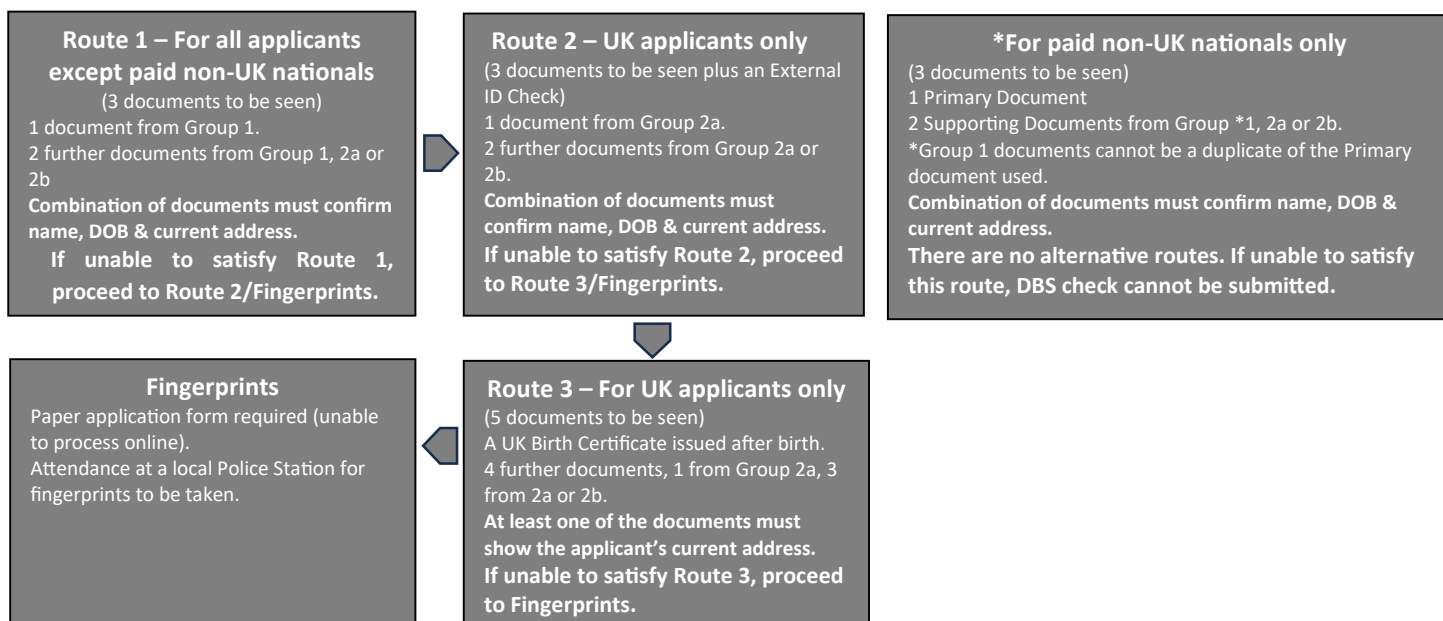
Mayflower Disclosure Services Ltd

Website: www.dbsdirect.co.uk

Standard & Enhanced DBS List of Acceptable Identification

From July 2021: 3 x Routes can be taken *except for Paid Non-UK nationals.

An authorised ID Checker/Application Manager must see and verify an applicant's original ID in accordance with the DBS ID Checking Guidelines. This list/process is stipulated by the DBS. It cannot be changed/altered/avoided. If an applicant cannot provide ID in accordance with this list a DBS check cannot be obtained.



Group 1 ID Documents

- Current valid Passport
- Biometric Residence Permit (UK)
- Current Driving Licence – photo card (UK / Isle of Man / Channel Islands) (Full or Provisional)
- Birth Certificate (UK / Isle of Man / Channel Islands) (Issued within 12 months of birth)

Full or short form acceptable including those issued by UK authorities overseas, such as Embassies, High Commissions & HM Forces. (Photocopies are not acceptable)

- Adoption Certificate (UK / Channel Islands)

Primary Documents for Paid Non-UK Nationals

- A current passport or passport card showing that the holder is a national of the Republic of Ireland.
- A current document issued by the Home Office to a family member of an EEA or Swiss citizen, and which indicates that the holder is permitted to stay in the United Kingdom indefinitely.
- A current Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder indicating that the person named is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK.
- Online evidence of immigration status. Either via the View and Prove service or using the BRP or BRC online service. Issued by the Home Office to the employer or prospective employer, which indicates that the named person may stay in the UK and is permitted to do the work in question. Must be valid. Note: this includes the EUSS digital status confirmation.

- A current passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.
- A current Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
- A current passport endorsed to show that the holder is allowed to stay in the UK and is currently allowed to do the type of work in question.
- A current Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder which indicates that the named person can currently stay in the UK and is allowed to do the work in question.
- A current document issued by the Home Office to a family member of an EEA or Swiss citizen, and which indicates that the holder is permitted to stay in the United Kingdom for a time limited period and to do the type of work in question.
- A frontier worker permit issued under regulation 8 of the Citizens' Rights (Frontier Workers) (EU Exit) Regulations 2020.
- A current Immigration Status Document containing a photograph issued by the Home Office to the holder with a valid endorsement indicating that the named person may stay in the UK and is allowed to do the type of work in question, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
- A document issued by the Home Office showing that the holder has made an application for leave to enter or remain under Appendix EU to the immigration rules on or before 30 June 2021 together with a Positive Verification Notice from the Home Office Employer Checking Service.
- An Application Registration Card issued by the Home Office stating that the holder is permitted to take the employment in question, together with a Positive Verification Notice from the Home Office Employer Checking Service.
- A Positive Verification Notice issued by the Home Office Employer Checking Service to the employer or prospective employer, which indicates that the named person may stay in the UK and is permitted to do the work in question.

Group 2a ID Documents

Trusted Government Documents

- Current Driving Licence – photo card only (All Countries except Group 1) (Full or Provisional)
- Current Driving Licence – pre-1998 paper version (UK / Isle of Man / Channel Islands) (Full or Provisional)
- Birth Certificate (UK / Isle of Man / Channel Islands) (Issued after the time of birth i.e.: +12 months after birth)
- Marriage / Civil Partnership Certificate (UK / Channel Islands)
- HM Forces ID Card (UK)
- Fire Arms Licence (UK / Isle of Man / Channel Islands)
- Immigration document, work permit or VISA (Issued outside of UK) (Valid only for roles whereby applicant is living and working outside of UK.)

Group 2b ID Documents

Financial & Social History Documents

- Mortgage Statement (UK) **
 - Bank/Building Society Statement (UK / Channel Islands) *
- Monzo statements or statements printed from the internet are not acceptable.
- Bank/Building Society Account Opening Confirmation Letter (UK) *
 - Credit Card Statement (UK) *
 - Financial Statement e.g. pension, endowment, ISA (UK) **
 - P45/P60 Statement (UK / Channel Islands) **
 - Council Tax Statement (UK / Channel Islands) **
 - Utility Bill (UK) - Not Mobile Phone *
 - Benefit Statement (UK) e.g. Child Allowance, Pension *
 - Document from Central/ Local Government/ Government Agency/ Local Authority (UK / Channel Islands) *
e.g. DWP, Employment Service, HMRC, Job Centre, Social Security
 - EEA National ID Card – must be valid
 - Cards carrying the PASS accreditation logo (UK / Isle of Man / Channel Islands) – must be valid
 - Irish Passport Card – must be valid (Cannot be used with an Irish Passport)
 - Letter from Head Teacher or College Principal (16-19 year olds in full time education in the UK)
 - Non-UK Bank/Building Society Statement *
- Branch must be located in the country in which the applicant lives and works
- Letter of Sponsorship from future employer

Non-UK only – valid only for applicants residing outside UK at time of application

Please note if a document in the List of Valid Identity Documents is:

- Denoted with * - issued in the last 3 months
- Denoted with ** - issued in the last 12 months

APPENDIX 5 : REGULATED ACTIVITY

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government has produced a [Factual note on regulated activity in relation to children](#):

Regulated activity includes:

- a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly.⁴⁴ Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

- relevant personal care, or health care provided by or provided under the supervision of a health care professional:
- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Appendix 6 –

Updates to Keeping Children Safe in Education – Online Recruitment Checks What is Changing?

From September 2022 the Keeping Children Safe in Education guidance has been updated to advise schools that they **should** consider carrying out online recruitment checks on shortlisted candidates.

Schools are guided that:

“In addition, as part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.”

Whilst KCSIE refers to ‘should’, KCSIE forms statutory guidance this means schools should undertake such steps unless there is a good reason not to. The guidance does not provide any such examples, and it is hard to envisage many (if any) circumstances when a school may decide not to undertake such checks.

Why Are the Changes Being Made?

The purpose of the online search is to identify any issues or incidents which may either:

- call into question a candidate’s suitability to work with children or young people in a school setting or in the role for which they have applied and / or
- present a reputational damage to the school should the candidate become part of the school’s workforce

There has been recognition for some time that an individual’s ‘digital footprint’ may reveal important information about their potential suitability to work with children and young people. Nationwide there have been a number of cases where individuals have been appointed to roles in education – only for it to subsequently be identified that there is information in the public domain which would make them unsuitable for the position they held. Therefore, the Government has deemed it appropriate that online searches should form part of the range of pre-employment checks a school undertakes during the recruitment process.

Who Should Be Checked?

Online recruitment checks should be carried out on all shortlisted candidates, it is imperative that these are carried out after shortlisting has taken place. All candidates regardless of their post or the nature of their contract should be subject to the check, this includes temporary and supply staff who are directly employed by the school. Staff employed via an agency should still be subject to the checks, but the agency should complete these. Schools are able to ask agencies if these have been completed in the same way as all the other pre-employment checks.

Candidates do not need to give consent for online checks to be undertaken but candidates should be advised in the recruitment documentation that this forms part of the school’s pre-employment checks and that an offer of employment would be subject to the successful outcome of such online recruitment checks. Adverts posted on the Kent-Teach website will automatically include a statement to advise candidates that they will be subject to online recruitment checks if they are shortlisted for the role.

What Information Should Be Searched for and How?

The new requirement is only for publicly available sources of online information to be checked, so a good place to start will be key search engines such as Google. It is a good idea to check more than one search engine as different engines may have different search results.

It may also be appropriate to review the content of publicly available social media profiles or pages on sites such as Facebook, Twitter, Instagram and YouTube for any images, comments or posts which may be incompatible with the role for which they have applied. There is no expectation, and schools should not seek to access information

that is 'locked down' in private accounts or in closed online forums or groups, doing so has the potential to be in breach of data protection legislation.

To assist in identifying the correct individual it would be reasonable for the school to ask candidates to confirm their social media account names or social media handles/tags. Candidates will be asked to provide this information on the school's application form.

The guidance does not specify the time span over which the search should be conducted but a reasonable time frame would be 6 years previous. You must ensure that all candidates are treated equally in terms of the time span being considered.

It is advisable that a senior manager who is not directly involved in the recruitment process undertakes the searches on shortlisted candidates, as it is important to take steps to avoid unconscious bias and to prevent any form of discrimination in the recruitment process.

How Should Potential Issues or Incidents Be Managed?

It is important to remember that online checks are only one aspect of the due diligence schools should undertake when assessing the suitability of candidates alongside the usual checks of qualifications, references, DBS disclosure, and of course the interview.

Recruiting managers should ensure they act fairly, consistently, and objectively in interpreting and assessing the relevance of any issues or incidents identified in online searches. Failure to do so may lead to allegations of unconscious bias or unlawful discrimination.

Recruiting managers should address issues or incidents with the candidate at the interview stage, or prior to the interview stage if the concerns are of a serious nature and/or it is deemed necessary and appropriate to do so. This allows the candidate the opportunity to explain the incident or issue from their perspective and for the interview panel to consider the candidate's attitude towards the issue and any mitigating factors or context before determining whether the issue or incident is of sufficient gravity to make the individual unsuitable for the job role. If you wish to remove the candidate from the recruitment process seek advice from our HR advisors.

You should also be mindful that some candidates may not have social media accounts or will have "locked down" all aspects of their social media presence to protect their privacy from students and parents who may wish to look for information about them online. The school should ensure no adverse inferences are drawn from this as part of the recruitment process.

Online recruitment checks do not replace the need for questions about the candidate's suitability to work with children, their motivations or their attitudes, and all candidates should still be asked about their suitability during the interview process.



Online Search Record

Candidate name:	
Role shortlisted for:	
Searcher name:	
Date and time of online search:	

SEARCH PARAMETERS	CONCERNS RAISED
<p>For example: Google search: The following terms, looking at the first page of results:</p> <ul style="list-style-type: none"> • ‘Candidate name’ • ‘Candidate name’ + ‘current school/employment’ • ‘Candidate name’ + ‘previous school/employment’ • ‘Candidate name’ + ‘educational institution’ • ‘Candidate name’ + ‘job title’ <p>Websites: The candidate’s name was typed into the search function of the following websites:</p> <ul style="list-style-type: none"> • LinkedIn • Twitter (checked the top 10 results) • Facebook (checked the top 10 results) • Their current school’s website 	<p>Only record information that suggests the candidate:</p> <ul style="list-style-type: none"> • Is unqualified for the role • Poses a potential safeguarding risk • Risks damaging the reputation of your school/trust <p>Don’t include any irrelevant personal information.</p>

Appendix 7 –

SCR Profiles & Documents and checks for each type of employee.

<u>Staff Profile</u>	<u>Documents</u>	<u>Details</u>	<u>Frequency</u>
Agency Staff Consultant	Vetting Sheet (See appendix 7a) Letter of assurance/Form 4 or 5	Received from the agency the employee is employed by	Once
Agency Staff Trustees-Regulated Trustee-Unregulated 3 rd Party Contractor Volunteer-Unregulated	Visitor/Volunteer Code of Conduct		Once
Teacher Support Staff Agency Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	Employee Record Card		Once
Teacher Support Staff Agency Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Regulated Volunteer-Unregulated*	Week 1 policy reading *Week 1 policy reading (Without Solar)		Once
Trustees-Regulated Trustee-Unregulated	Immediate Training Schedule		Once
Teacher Support Staff Agency Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	ICT usage form	1 st paper form and scanned/saved to personnel 365 file	Once as part of the recruitment process then yearly or as required electronically through CPOMS
Trustees-Regulated Trustee-Unregulated	AP01 Form		Once
Trustees-Regulated Trustee-Unregulated	Charities Commission registration		
Trustees-Regulated Trustee-Unregulated	Confirmation of submission to Charities Commission		Once
Trustees-Regulated Trustee-Unregulated	Companies House registration		
Trustees-Regulated Trustee-Unregulated	Confirmation of submission to Companies House		Once
Teacher Support Staff Agency Staff Trustees-Regulated* Trustee-Unregulated* Volunteer-Regulated	Induction Pack *Trustee induction pack separate from standard	Agency staff to be issued once Temp to Perm confirmed	Once

Teacher Support Staff Agency Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	Email/365 account		Once
Trustees-Regulated Trustee-Unregulated	NGA Logon		Once
Teacher Support Staff Agency Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	Mentor account		Once
Teacher Support Staff Agency Staff Volunteer-Regulated	TES account		Once
Teacher Support Staff Agency Staff Volunteer-Regulated	SIMS account		Once
Teacher Support Staff Agency Staff Consultant Volunteer-Regulated	CPOMS account		Once
Teacher Support Staff	Lessons Learned account		Once
Teacher Support Staff Agency Staff Volunteer-Regulated	Every account		Once
Teacher Support Staff (If applicable)	Laptop		Once
Teacher Support Staff Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	Interview		Once
Teacher Support Staff Trustees-Regulated Trustee-Unregulated Volunteer-Unregulated* Volunteer-Regulated*	Application form *Volunteer version		Once
Teacher Support Staff Trustees-Regulated Trustee-Unregulated Consultant Volunteer-Regulated	Overseas check (If applicable)		Once

Teacher Support Staff Volunteer-Regulated	Interview Notes		Once
Teacher Support Staff Consultant Trustees-Regulated Trustee-unregulated Volunteer-Regulated	Educational certificates		Once
Teacher Support Staff	Salary confirmation by SLT	*Would be re-issued upon adjustment/change of role	Once*
Teacher Support Staff Consultant Trustees-regulated Trustee-unregulated 3 rd Party Contractor Volunteer-Regulated Volunteer-Unregulated	DBS certificate	A new certificate would be applied for if the staff members DBS update service registration lapses'. Chair trustee to hold certificate signed by secretary of state	Once
Teacher Support Staff Consultant Trustees-Regulated Trustee-Unregulated 3 rd Party Contractor Volunteer-Regulated	DBS Update Service	Initial check held in personnel red SCR file, subsequent checks in personnel 365 file	Once as part of the recruitment process then yearly
Teacher Support Staff Consultant Trustees-Regulated Volunteer-Regulated	Barred List Check		Once
Teacher Support Staff Consultant Trustees-Regulated Trustee-Unregulated 3 rd Party Contractor Volunteer-Unregulated Volunteer-Regulated	2/3 forms of identification	2 if, already holds relevant DBS certificate & registered to the DBS update service. 3 rd party contractor to provide 1 form photo identification	Once
Teacher Support Staff Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	Offer Letter		Once
Teacher Support Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Unregulated Volunteer-Regulated	Confirmation of fitness to work	Statement signed as part of Offer letter given	Once
Teacher Support Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	Employee Privacy notice		Once as part of the recruitment process then yearly or as required electronically through CPOMS

Teacher Support Staff Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	Job Description	*Would be re-issued upon adjustment/change of role	Once*
Teacher Consultant Trustees-Regulated Trustee-Unregulated	TRN Check		Once
Teacher Support Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Unregulated Volunteer-Regulated	Prohibition from teaching check	Initial check held in personnel red SCR file, subsequent checks in DSL SCR folder	Once as part of the recruitment process then monthly
Teacher Support Staff Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	128 checks (Finance Related)	Initial check held with personnel red SCR file, subsequent checks in DSL SCR folder	Once as part of the recruitment process then monthly
Teacher Support Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Unregulated Volunteer-Regulated	Right to work		Once
Teacher Support Staff Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	Full employment history		Once
Teacher Support Staff Consultant Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	2 references covering 3/5 years		Once
Teacher Support Staff Volunteer-Unregulated* Volunteer-Regulated*	Contract of employment *Volunteer agreement	*Would be re-issued upon adjustment/change of role	Once*
Teacher Support Staff	HMRC Checklist		Once
Teacher Support Staff	New Starter payroll details form	*Would be re-issued upon request	Once*
3 rd Party Contractor	Agreement of Placement by CoRS		Once
3 rd Party Contractor	Company placed by disclaimer & Insurance		Once
Teacher Support Staff Trustees-Regulated Trustee-Unregulated Volunteer-Regulated	Full Medical form	*Would be checked/updated monthly	Once*
Volunteer-Unregulated	Red lanyard with photo ID		Once

Appendix 7A

Agency Staff

Vetting sheet (Letter of assurance) from agency confirming-
Educational certificates
DBS certificate check
DBS update service check (If applicable)
Barred list check
Identification checks
Prohibition from teaching check
TRN check (If applicable)
Overseas check (If applicable)
Section 128 checks (If applicable)
Right to work
References
Confirmation of fitness to work.

Appendix 8

City of Rochester School
Bradbury House
View Road
Cliffe Woods
Rochester
Kent ME3 8UJ

Form 4 - Revised March '24



Dear Colleagues,

Safeguarding (Child Protection) & recruitment clearances for: [Name of Provider in here](#)

Could you please confirm, that for every member of staff that will work with our pupils, that the following relevant checks and obtaining of certificates has been carried out. Please include the date each confirmation was received and the DBS certificate number for all relevant staff members. Please return this form with a copy of your headed paper with the date and name and signature of the **authorised person** who can confirm that:

(please tick or write 'N/A' where appropriate)

Photo ID has been checked		Proof of address has been checked	
Evidence of right to work in the UK has been checked (where applicable)		Criminal overseas checks have been conducted (where applicable)	
Evidence of relevant professional qualifications/training has been seen and that these are in date and relevant to the activity. Please provide details in here:		Checks for prohibition from teaching and Proof of their past conduct as a teacher as issued by the professional regulating authority in the country in which the applicant has worked, if outside the UK	
Enhanced DBS checks have been conducted as per below		Fit to work	
All staff are appointed under your company's Safer Recruitment Policy		Name(s) and Certificate Number(s) of DBS Certificate(s) and date(s) seen and who has had a Barred List check:	
Details of appropriate insurance: For example, Public Liability and/or Professional Indemnity (copy of certificate required).			

Disclosure and Barring Service: - Staff have Enhanced DBS clearances which cover the following areas:

- any police records of convictions, cautions, reprimands and warnings
- information from the list held under Section 142 of the Education Act 2002
- Children's Barred List Information – this would show if an applicant is Barred from working with children
- any other relevant information disclosed at the Chief Police Officer(s) discretion. Under this section would be noted "soft information". This could be details of a household member (other than the applicant) who may have a record that would contain information that an employer would need to be aware of. An example of this may be a household member who has been involved in drug related activity.

City of Rochester School's Safeguarding Policies are available for your information on request or from our website:

www.cityofrochesterschool.org

Yours faithfully
Mrs A. Emmett
Headteacher

City of Rochester School
 Bradbury House
 View Road
 Cliffe Woods
 Rochester
 Kent
 ME3 8UJ

Form 5 - Revised March '24



Dear Colleagues,

Safeguarding (Child Protection) & Recruitment Clearances

Could you please confirm, that for every member of staff that will work with our pupils, that the following relevant checks and obtaining of certificates has been carried out. Please include the date each confirmation was received and the DBS certificate number for all relevant staff members. Please return this form with a copy of your headed paper with the date and name and signature of the **authorised person** who can confirm that:

(Please tick or write 'N/A' where appropriate)

Staff Name: _____ Job Role: _____

DBS Certificate Number: _____ DBS Certificate issue date: _____

Photo ID has been checked	Document:	Date Checked:	
Proof of Address		Date Checked:	
Evidence of right to work in the UK has been checked (where applicable)	Document:	Date Checked:	
Criminal overseas checks have been conducted (where applicable)	Certificate:	Date Seen:	
Evidence of relevant professional qualifications/training has been seen and that these are in date and relevant to the activity. Please provide details in here:		Date Seen:	
Enhanced DBS checks have been conducted as per below*		Date Checked:	
Fit to work		Date Checked:	
Employment Reference 1	Date Received:	Date Checked:	
Checks for prohibition from teaching and Proof of their past conduct as a teacher as issued by the professional regulating authority in the country in which the applicant has worked, if outside the UK	Status of Checks- (Clear/Contains Information) Prohibition from teaching: TRN Status: Section 128:	Date Checked: Date Checked: Date Checked:	

City of Rochester School is committed to safeguarding and promoting the welfare of students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

All staff are appointed under your company's Safer Recruitment Policy	Yes/No (Please Circle)	Date Cleared:	
Details of appropriate insurance: For example Public Liability and/or Professional Indemnity (copy of certificate required).			

Disclosure and Barring Service: - Staff have Enhanced DBS clearances which cover the following areas:

- any police records of convictions, cautions, reprimands and warnings
- information from the list held under Section 142 of the Education Act 2002
- Children's Barred List Information – this would show if an applicant is Barred from working with children
- any other relevant information disclosed at the Chief Police Officer(s) discretion. Under this section would be noted "soft information". This could be details of a household member (other than the applicant) who may have a record that would contain information that an employer would need to be aware of. An example of this may be a household member who has been involved in drug related activity.

This form has been completed by-

Name: _____ Date: _____

Job Role: _____

For or on behalf of (Company Name): _____

City of Rochester School's Safeguarding Policies are available for your information on request or from our website:

www.cityofrochesterschool.org

Yours faithfully,

Mrs A. Emmett
Headteacher