



## Safer Recruitment Policy

### Equality Statement

Centre Academy East Anglia is committed to a policy of equality and aims to ensure that no employee, job applicant, pupil or other member of the school community is treated less favourably on grounds of sex, race, colour, ethnic or national origin, marital status, age, sexual orientation, disability or religious belief. We provide a safe, supportive and welcoming environment

To be reviewed annually

Next review date: September 2020

Signed:

A handwritten signature in black ink, appearing to read "D. J. Rollo".

Date: 02/09/19

Principal and CEO

Dr Rollo

Signed:

A handwritten signature in black ink, appearing to read "K. Salthouse".

Date: 02/09/19

Head of School

Mrs Salthouse

*Centre Academy East Anglia is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment.*

This policy outlines our commitment to safeguarding and promoting the welfare of children who are pupils at the School by ensuring we have implemented procedures designed to prevent unsuitable people working with our pupils.

Safeguarding and promoting the welfare of our pupils is our highest priority. Centre Academy East Anglia aims to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

This policy applies to the whole school, including EYFS. These procedures are designed to comply with the guidance given by the DfE as defined in 'Keeping Children Safe in Education September 2019' in conjunction with 'Working Together to Safeguard Children 2018' and also the Local Safeguarding Children's Board, Suffolk, Key safeguarding Employment Standards, and forms an element of the School's Safeguarding Policy to which reference should also be made.

The aims of the School's Safer 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 2019 (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); 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.

## **ROLES AND RESPONSIBILITIES**

It is the responsibility of the Principal/Head of School to:

- Ensure the School has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements.
- Monitor the School's compliance with them.
- It is the responsibility of the Head of School, and Senior Management Team involved in recruitment to:
- Ensure that the School operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the School.
- Monitor contractors' and agencies' compliance with these safer recruitment procedures.
- Promote the welfare of children and young people at every stage of the recruitment process.

## **RECRUITMENT AND SELECTION PROCEDURE**

### **Advertising**

To ensure equality of opportunity, the School will advertise all vacant posts to encourage as wide a field of applicant as possible; this could entail an external advertisement.

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

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act 2018 (DPA).

## **Application Forms**

Centre Academy East Anglia (CAEA) uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history), a health questionnaire and applicants are requested to bring all original qualification certificates if offered an interview. Incomplete application forms will not be shortlisted. CVs will not be accepted in place of the application form, but both may be submitted by the applicant if they so wish.

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. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.

## **Job Descriptions**

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

## **References**

References for short listed applicants may be sent for prior to interview unless the applicant has expressly indicated on their application form that they do not wish their current employer to be contacted at that stage. In any event, references will be taken up before any offer of employment is confirmed.

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 if possible. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions.

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".

No questions will be asked about health or medical fitness prior to any offer of employment being made.

Any discrepancies or anomalies will be followed up. Direct contact by phone will be undertaken with referees to verify the reference.

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

## **Interviews**

There will always be a face-to-face interview except in extreme circumstances (for example recruitment of a teacher from overseas), and wherever possible, a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description. It will enable the School to explore any anomalies or gaps have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).

Applicants will be specifically asked if, prior to a DBS check being carried, there is anything they wish to notify the recruiting panel of in advance of the checks being made.

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

Notes of the interviews will be made by the recruiting panel.

**Teaching posts:** For a senior post, the panel will include the Head of School, the Principal, and a member of staff with Safer Recruitment training for example Head of Care or Head of Schools secretary. An academic specialist from outside the School may also be included. For all academic staff it would be usual for the Head of School and at least two other senior members of staff to be involved in the selection process, at least one of whom will have undergone accredited Safer Recruitment training. In most cases candidates will be required to teach a sample lesson and will be informed in advance of what will be required and at what stage during the interview process this will take place.

**Non-teaching posts:** The interview panel will comprise at least one senior staff member, who has undergone accredited Safer Recruitment training, and at least one other management representative. Dependent on the post, there may be a separate assessment of ability/skills required for the role.

In addition to assessing and evaluating the applicant's suitability for the particular post, the interview panel will also explore:

- The candidate's attitude towards children and young people;
- His/her ability to support the School's agenda for safeguarding and promoting the welfare of children
- Any gaps in the candidate's employment history
- Concerns or discrepancies arising from the information provided by the candidate and/or a referee; and
- Whether the candidate wishes to declare anything in the light of the requirement for a DBS check

Teaching staff criteria: All candidates for teaching posts will be selected after reference to specific criteria for the post advertised. In general, we will look for:

- Relevant qualifications at degree level from a reputable university or college
- Relevant experience, particularly in comparable schools and colleges
- The ability to teach across the curriculum
- A willingness to contribute to co-curricular activities and, where appropriate, relevant experience and qualifications
- A willingness to participate in the pastoral system.

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Original documents only will be accepted and photocopies will be taken. Unsuccessful applicants' documents will be destroyed six months after the recruitment process is concluded.

### **Offer of appointment and new employee process**

Where possible, the Head of School or the CEO/Principal will inform the successful candidate by telephone within 48 hours of the interview. After verbal acceptance of the post, a conditional letter of appointment is sent to the chosen candidate, along with a statement of the terms and conditions of employment. The applicant will be required to accept the post and the related conditions in writing.

In accordance with the recommendations set out in KCSIE and the requirements of the Education (Independent School Standards) Regulations 2014 the School carries out a number of pre-employment checks in respect of all prospective employees.

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Ask for written information about previous employment history and check that information is not contradictory or incomplete
- 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 two references (one of which must be from the applicant's most recent employer) which the School considers to be satisfactory. If a reference is taken over the phone, detailed notes will be taken, dated and signed. Once a written reference is received, a verbal confirmation is carried out to the referee, this is then signed and dated and kept in the personal file.
- for positions which involve "teaching work":
  - the School being satisfied that the applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by The Teachers Service System, or any predecessor or successor body, or by a regulator of the teaching profession in any other European Economic Area country which prevents the applicant working at the School or which, in the School's opinion, renders the applicant unsuitable to work at the School; and
  - the School being satisfied that the applicant is not, and has never been, the subject of any proceedings before a professional conduct panel or equivalent body in the UK or any other country for any reason which prevents the applicant working at the School or which, in the School's opinion, renders the applicant unsuitable to work at the School;
- for those in management position (or where deemed by the School as applicable) confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies or restricts them from providing education at a school, taking part in the management of an independent school or working in a position which involves regular contact with children;
- confirmation that the applicant is not 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;
- verification of the applicant's medical fitness for the role;
- verification of the applicant's right to work in the UK; (for any member of staff who is not a national of a European Economic Area (EEA) country); We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards. Obtain a Certificate of Good Conduct for applicants who were born or have worked abroad where the applicant has not worked in a school in the UK since moving from overseas. Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- evidence of name, address and date of birth;
- 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).
- teaching posts, verification of successful completion of statutory induction period
- for non-teaching posts, satisfactory completion of the probationary period
- if a candidate has changed his/her name by deed poll or any other mechanism – marriage, adoption, statutory declaration – he/she must provide documentary evidence of the change.

**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
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- 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**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will 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 the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- If 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.

The School will independently verify the identity of staff supplied by contractors or an agency on their first day of working at the School.

### **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.

The School does not obtain a 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 and/or permit a speaker to attend the School. In doing so the School will always have regard 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 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.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Contractors who come on site only to carry out emergency repairs or service equipment and who are not expected to be left unsupervised on the School's premises do not need a DBS Disclosure.

### **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 Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

### **Volunteers**

The School will request the following checks on all volunteers who are involved on a regular basis, undertaking regulated activity or accompanying children on an overnight trip, we will:

- Under no circumstances will the school 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
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
  - Identity checks
  - Qualifications, if applicable
  - References
  - An informal interview and confirmation of no contrary indications from the School community

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. If the volunteer has signed up to the DBS Update Service, the School will obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates if the three month period has elapsed.

Volunteers or parents who accompany staff on one-off outings or trips and do not have unsupervised access to children will not need to be vetted.

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

All applicants invited to attend an interview at the School will be required to bring their identification documentation such as passport, birth certificate and driving licence with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006.

### **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.

All applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required. This information will be reviewed against the Job Description for the particular role, together with details of any other physical or mental requirements of the role.

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.

### **Overseas checks**

The School, in accordance with the UK Visas and Immigration (UKVI) will, if applicable, sponsor new foreign nationals.

In addition, applicants who have lived/travelled abroad for more than 3 months will need to obtain a criminal records check from the relevant country. The applicant will not be permitted to commence work until the overseas information has been received and is considered satisfactory by the School.

From 5 September 2016, in accordance with KCSIE 2019, 'further' overseas checks will include the School conducting a check for information about any teacher sanction or restriction that has been imposed by a professional regarding authority in the European Economic Area (EEA). This check is relevant to applicants for teaching posts in England who have taught in the EEA. It is applicable to both foreign nationals and UK nationals who have taught in the EEA. This check is carried out by the School using the NCTL Teacher Services system. Only restrictions imposed on or after 18 January 2016 will be displayed on the Teacher Services system.

### **Equal Opportunities Form**

Applicants are sent an Equal Opportunities questionnaire to complete once they have been offered the position at the School. The form is not used in any decision making and it is optional to complete. The form enables the School to monitor the effectiveness of the Equal Opportunities Policy.

### **Induction Programme**

All new employees will be given an induction programme which will clearly identify the School Policies and Procedures, including the Safeguarding Policy and Part One of KCSIE (update September 2019) and make clear the expectations which will govern how staff carry out their roles and responsibilities.

All staff, academic, administration, support and ancillary, will have annual child protection and safeguarding awareness training.

All staff (including temporary and volunteer staff) joining the School, at whatever point in the school year, will have a child protection and safeguarding training session, as a part of their induction, with the Designated Safeguarding Lead. This training will be at least equal to the awareness courses that all staff attend once a year. All staff will have a copy of this policy document and the key 'what to do if' elements will be emphasised. All staff will also be given a copy of part one of KCSIE, September 2019.



All staff must read Part 1 of KCSIE, September 2019, and the DSL has a responsibility to assist staff to ensure that they have a clear understanding of the document and their responsibilities. This will be done as part of staff training, but in addition all staff are encouraged to seek direct guidance from the DSL on any matter that is unclear to them.

### **Childcare Act 2006(the Act) and the Childcare (Disqualification) Regulations 2009 (the Regulations) and the related DfE Statutory Guidance**

When necessary we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 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.

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The checklist will be retained on personal files.

All appointments are subject to a probationary period during which time a reduced notice period applies enabling termination of the employment for whatever reason, by either the employee or the School in a shorter time frame than would normally apply under the standard terms of their contract. The School's disciplinary and capability procedures do not apply during this probationary period. The School also reserves the right to extend this probationary period should it deem this necessary.

### **Governance**

All governance members will have an enhanced DBS check without barred list information and section 128 check (section 128 checks are only required for local governance members if they have been delegated any management responsibilities). They will have an enhanced DBS check with barred list information if working in regulated activity.

The Proprietors will also have the following checks:

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

### **Adults who supervise pupils on work experience**

Students at CAEA attend work experience when they are in the American Diploma class (the age range is from 17 to 19). We will get written confirmation from the alternative provider that appropriate safeguarding/Health & Safety checks have been carried out on individuals working at the establishment.

When organising work experience and when appropriate, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Pupils staying with host families**

If the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

### **Single Centralised Register (SCR) 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 (known as the "SCR") is kept in accordance with the Education (Independent School Standards) Regulations 2014 requirements. This is kept up-to date and retained by the Secretary to the Head of School. The SCR will contain details of the following:-

- all employees who are employed to work at the School;
- all employees who are employed as supply staff to the School;
- all staff of contractors who are in School on a frequent basis
- coaches (such as karate coaches and DofE mountain leaders) brought in by the School to work with pupils
- volunteers who may be in regulated activity and for whom therefore checks have been completed
- Governance

### **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 issue.

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 in a locked and secure cabinet in the Head of School's Office.

The same policy applies to any suitability information obtained about volunteers involved with School activities.

In accordance with the Data Protection Act 2018, the School will retain the recruitment documentation on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed.

### **DBS (Disclosure and Barring Service) Certificate** (formerly known as CRB Disclosure)

The School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List 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.

It is the School's policy that the DBS disclosure must be obtained or DBS application submitted before the commencement of employment of any new employee, as it assumed that all staff could have the opportunity to be in regulated activity, regardless of their role.

All staff have a DBS check done every 5 years, through our Umbrella Company Atlantic Data.

### **Portability of DBS Certificates Checks**

Staff are informed of the opportunity to join the DBS Update Service if they are likely to require another check in the future, but it is their own responsibility to do so.

### **Copies of DBS Checks**

The DBS no longer issue Disclosure Certificates to employers, therefore all new employees must bring the original certificate into the School for verification on or before their first day of employment, before any regulated activity commences.

If employment commences before the DBS certificate is verified, this may take place provided all other recruitment checks have been satisfactorily completed, and the new employee is **kept under supervision** at all times whilst on site. This situation may occur if the DBS process is delayed to such an extent that, in the opinion of the Head of School, further delay to the start date of the new employee would be to the serious detriment of the School. A stand-alone check of the Children's barred list is undertaken before they start employment (if working in regulated activity).

### **Dealing with convictions**

The School operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

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

A formal meeting will take place face-to-face to establish the facts with the Head of School. A decision will be made following this meeting. 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 Head of School will evaluate all of the risk factors above before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the 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.

### **DBS Risk Assessment**

#### **If the Disclosure Check is Not Available Before the Start Date**

New starters undertaking "regulated" activity must not commence employment in that role until all of the statutory pre-employment checks have been carried out, including the DBS Enhanced Disclosure check.

In the unlikely event that it has not been possible to obtain a satisfactory Disclosure before the individual is scheduled to commence employment and Centre Academy East Anglia believes that it is necessary for the individual to start work, the Principal/Head of School has discretion to allow an individual to begin work pending receipt. However, the Principal/Head of School can only allow the employee to commence work in the event that the individual is appropriately supervised AND that all the other statutory pre-employment checks have been completed.

Appropriate supervision for individuals who start work prior to the result of a DBS Disclosure being known should reflect what is known about the person concerned, their experience, the nature of their duties and the level of responsibility they will carry.

The level of supervision required will probably be high (a constant chaperoning situation).

- In the case of children, the person has an enhanced DBS certificate issued within the last year by another body and the person provides the original enhanced DBS certificate to the Principal/Head of School as evidence.
- All other Safer Recruitment checks are in place.
- An Enhanced DBS check has been applied for.
- They have no access to records.

All documentary evidence must be original and not a photocopy. Evidence of all checks is sought from supply agencies before any temporary member of staff commences employment.

Unsuccessful candidates will be informed by email or letter as soon as possible but in any case within a fortnight after interviews have taken place.

## Supervision Pending/Conviction Disclosure

**A Risk Assessment form can be used to assist in assessing and recording the risks of allowing someone to start work before a DBS (Disclosure and Barring Service) check is received or where a DBS certificate shows relevant convictions or other relevant information. The risk assessment must be undertaken in accordance with the Policy on Employment of Ex-Offenders and Disclosure and Barring Service checks.**

The completion of this risk assessment form is the responsibility of the Principal/Head of School. It must be authorised by the Principal/Head of School **before** the person can start or continue working with children or vulnerable adults or their records. This completed risk assessment form must be placed on the individual's personnel file.

In **very exceptional circumstances** staff (but not volunteers) who work with children, vulnerable adults or their records may work without a clear Enhanced DBS certificate if they are closely supervised (within sight and sound of someone with a clear DBS check). However, this will normally **only be permissible when not to allow them to work would disrupt the care of children. People may only work in these circumstances when the following applies:**

- The appointment is necessary to allow the service provision to continue.
- In the case of children, the person has an enhanced DBS certificate issued within the last year by another body and the person provides the original enhanced DBS certificate to the Principal/Head of School as evidence.
- All other Safer Recruitment checks are in place.
- An Enhanced DBS check has been applied for.
- The person has no unsupervised contact with children.
- They have no access to records.
- A Risk Management plan and/or assessment has been completed and signed off by the Principal/Head of School.

Due to the high risks involved appointees to work in one to one situations or in residential care or similar environments must not start work until the fresh DBS certificate has been seen.

*Please note that candidates may be able to carry out induction, training and supervised tasks whilst waiting for the DBS certificate to be returned.*

### Internal Appointments

Internal Appointments: Applications for externally advertised posts are encouraged from internal candidates. Equal consideration is given to internal candidates when short-lists are drawn up. For senior posts advertised within the School, the appointments procedure follows a similar pattern to that for external recruitment but minor internal appointments may be made without recourse to the interview procedure.

Induction: All new staff will be expected to undergo an induction programme organised for them by the Head of School or their line manager in the case of non-teaching staff. **(see Induction Policy)**

It is not normally the policy of the School to provide feedback to unsuccessful candidates

### Monitoring and Audits

Monitoring systems and quality assurance are embedded to ensure that the policy is followed through into practice.

Formal audits of sufficient quality and quantify are conducted regularly, allowing ample time for improvements to be made post audit, with results recorded and reported effectively.

The CEO/Principal and the Head of School understand the requirements of the SCR and are confident how the SCR is completed and updated as necessary. The Head of School and CEO/Principal are responsible for the correct vetting of staff.

The SCR is managed by the school secretary and ultimately is monitored and audited regularly, half termly, and signed off by the Head of School and the CEO/Principal.

The Local Authority/Ofsted audit the school's SCR when inspecting the school.

***This policy should be read in conjunction with:***

*The Child Protection and Safeguarding Policy*

*Whistle Blowing Policy*

*Complaints Policy*

*Work Experience Policy*

*CAEA Handbook for Faculty and Staff*

*CAEA Procedures and Policies for all CAEA Employees*

***References made to:***

*Staff Application Form/Non-Teaching Staff Application Form/Staff Medical Questionnaire*