




Safer Recruitment Policy

Signed	
Position	Head of School
Date Agreed	September 2023
Next Review	September 2024

Equality Statement

Centre Academy London 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.

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

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1. Aims

This policy outlines the commitment of Centre Academy London (CAL) to safeguarding and promoting the welfare of all our pupils by underscoring and ensuring that we have in place all those procedures designed to prevent unsuitable people working with our pupils.

- Our commitment covers:
- Safeguarding and protecting all children and young people at CAL by implementing robust safer recruitment practices
- Identifying and rejecting applicants who are unsuitable to work with children and young people
- Responding to concerns about the suitability of applicants during the recruitment process
- Responding to concerns about the suitability of employees and volunteers once they have begun their role
- A list of the supporting procedures that accompany this policy

2. Roles and Responsibilities

It is the responsibility of the 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 the Senior Leadership 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.

3. Recruitment and selection process

The recruitment steps outlined below are based on:

- Part 3 of Keeping Children Safe in Education 2023
- Working Together to Safeguard Children (2018)
- Wandsworth Safeguarding Children Partnership [Safer recruitment - Wandsworth Safeguarding Children Partnership \(wscp.org.uk\)](https://www.wscp.org.uk)
- NSPCC guidance on safer recruitment Safer recruitment | NSPCC Learning

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

4. Advertising

When advertising roles, we will make clear:

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

5. Application forms

CAL uses its own application form, which all applicants for employment are required to complete. The form contains questions about their academic and full employment history and their suitability for the role; all applicants are required to account for any gaps or discrepancies in their employment history and 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 an offence for CAL 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.

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- An overview of our safer recruitment process so that candidates understand what information will be sought from them and why, and what will be expected of them at each stage of the process

- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

6. Shortlisting

Our shortlisting process will involve at least two people and will:

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

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

7. References and employment history

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

When seeking references, we will:

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

- Resolve any concerns before any appointment is confirmed
- Obtain a minimum of two references which are considered satisfactory by the school

8. Interview and selection

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

When interviewing candidates, we will:

- Always conduct a face-to-face interview
- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made
- Allow student participation. Involving children and young people is a really useful way of finding the right people for the role
- Conduct a lesson observation or a practical test

9. Pre-appointment vetting checks

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.

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

10. New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state
- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.
- We will 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;
- 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.
- Evidence of name, address and date of birth;
- Teaching posts, verification of successful completion of statutory teacher induction period we require to see relevant certification
- 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.
- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

** Management positions are most likely to include, but are not limited to, head teachers, principals and deputy/assistant head teachers.*

Regulated activity means a person who will be:

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

11. Existing staff

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

12. 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.

13. 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 during school hours has had the appropriate level of DBS check or is accompanied at all times (this includes contractors who are provided through a PFI or similar contract). 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.

14. 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.

15. Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

16. Governors

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

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

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK.

17. Adults who supervise pupils on work experience

When organising work experience, 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.

18. Medical Fitness

CAL 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.

19. Overseas checks

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered.

Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability. Where this information is not available schools and colleges should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment. Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should

consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment. Further information can be found in DfE Guidance: <https://www.gov.uk/guidance/recruit-teachers-from-overseas>

Some overseas qualified teachers can apply to the Teaching Regulation Agency (TRA) for the award of qualified teacher status (QTS) in England. More information about this is available <https://www.gov.uk/guidance/qualified-teacher-status-qts>

21. 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.

22. 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 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.

All staff must read Part 1 of KCSIE, 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.

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

23. Single Centralised Register (SCR)

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 PA 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 e.g. Kleen Keepers
- 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

24. 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.

Disclosure and Barring Service (DBS) 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, and before any regulated activity commences.

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 CAL believes that it is necessary for the individual to start work, the Head of School have discretion to allow the individual to begin work pending receipt.

However, the Head of School can only allow the employee to commence work if the individual is appropriately supervised AND if all the other statutory pre-employment checks have been completed.

Additionally, the school will evaluate the risks through a risk assessment.

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 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.

25. 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 Head of School. It must be authorised by the 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 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 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.

26 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.

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

27. Supporting documents

This policy should be read in conjunction with:

- Child Protection and Safeguarding Policy
- Whistle Blowing Policy
- Complaints Policy
- Work Experience Policy
- CAL Handbook for Faculty and Staff

References made to:

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