

## Recruitment, Selection and Disclosure Policy

### 1. Introduction

Heritage School is committed to ensuring the best possible environment for the children and young people in its care. The Trustees are responsible for the management of the school and safeguarding and promoting the welfare of children and young people is our highest priority.

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 legislation, recommendations and guidance that governs our practices with respect to recruitment include: the Education (Independent School Standards) Regulations 2014 (ISSRs), the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education (1 September 2023) (KCSIE), Disqualification Under the Childcare Act 2006 (DUCA), 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).

Heritage School seeks to hire the best qualified personnel and to provide equal opportunity for the advancement of its employees. Heritage School does not discriminate against any employee on the basis of a Protected Characteristic, with the sole exception of appointments to positions where adherence to the Christian faith is a Genuine Occupational Requirement, as explained in our Equalities Policy and Christian Ethos Policy. Heritage welcomes applications from disabled candidates, provided the school can make reasonable adjustments as explained in our Disability Policy. These policies are available on the School's website.

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

The Recruitment, Selection and Disclosures Policy and Procedure herewith refers and applies to staff directly recruited and employed by the School. In the Education (Independent Schools Standards) (England) Regulations 2014, staff are defined as:

*Any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer.*

This applies whether the individual is working in person at the school, or is working with children online. The safer recruitment of contractors and agency staff is dealt with in section 8, and of volunteers in section 9.

An entry will be made on the Single Central Register for all current members of staff at the School, the proprietorial body and all individuals who work in regulated activity with children (see 7.2.2) including volunteers, contractors and agency staff.

### 2. Data Protection

The School is legally required to carry out the pre-appointment checks detailed in this procedure. Staff and prospective staff will be required to provide certain information to the School to enable the School to carry out the checks that are applicable to their role. The School will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency. Failure to provide requested information may result in the School not being able

to meet its employment, safeguarding or legal obligations. The School will process personal information in accordance with its Staff Privacy Notice (available from the School Office); the Recruitment Privacy Notice and the Data Protection Policy (both available from the School's website).

### **3. Recruitment and Selection Procedure - Application and Shortlisting**

All applicants for employment will be required to fully complete an application form containing questions about their academic and employment history and their suitability for the role. 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. This policy and the School's Safeguarding Policy are available to download from the School's website.

The School will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post.

Checks will be made of previous employment history to ascertain satisfactory reasons for any gaps in employment. These checks will then be checked against references and any discrepancies discussed with the candidate.

The school takes its responsibility to safeguard children very seriously and any staff member and/or candidate who is aware of anything that may affect his/her suitability to work with children must notify the Bursar immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

The School will conduct a shortlisting exercise by reviewing all application forms received in order to determine which applicants will be invited for interview. The School will shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. At least two people will carry out the shortlisting exercise, consider any inconsistencies, look for gaps in employment and reasons given for them and explore all potential concerns.

### **4. Recruitment and Selection Procedure - Online Search**

Online searches form part of the school's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

KCSIE 2023 states:

"... as part of the shortlisting process, schools and colleges should consider carrying out an online search as part of their due diligence on... 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." (para 220, KCSIE 2023).

Online searches will be used to identify "... any incidents or issues" that are publicly available online. This may include, for example, offensive or inappropriate behaviour or language, drug or alcohol misuse, inappropriate images, discriminatory behaviour, and any other information that may raise concern as to an applicant's suitability to work with children.

In evaluating any online information for relevance the School will use the following criteria:

- whether the information is relevant to the position applied for;
- whether the information is relevant to the applicant's suitability to work at the School or in an education setting;
- whether the information could have an impact on the School's reputation (whether positive or negative);
- whether the information calls into doubt the applicant's willingness or ability to uphold the School's commitment to safeguarding and promoting the welfare of children;
- the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published;
- whether the information reveals a pattern of concerning behaviour; and
- the relevant circumstances and the explanation(s) offered by the applicant.

Online searches will only be carried out on shortlisted candidates (including internal candidates) and will be carried out prior to interview so that any identified issues or incidents can be raised with the applicant during the interview, if felt necessary.

Where online searches do not reveal any relevant information, a note of this should be made on the candidate's file along with the search criteria used, the initials of the staff member carrying out the search, and the date of the searches. It is not necessary to retain any search results in these circumstances. Where relevant information is retrieved, this should be retained on the candidate's file along with records of discussions and decisions made with respect to it.

Data relating to online search criteria, results of searches and decisions relating to this data should be held securely and confidentially with other data collected during the recruitment process. It should only be accessible to a limited number of staff as necessary and should only be held for as long as it is needed. The retention period for this data will depend on whether the candidate is ultimately successful and joins the school.

For successful candidates, the School will retain information generated through online searches for the duration of the individual's employment and in accordance with its Staff Privacy Notice after employment ends.

For unsuccessful candidates, the School retains information generated from online searches for six months from the date on which they are informed their application was unsuccessful, and in accordance with its Recruitment Privacy Notice.

It is possible that online searches may reveal details of a candidate's spent convictions, in which case the requirements of the Rehabilitation of Offenders Act 1974 will need to be considered. Legal advice should be sought in these circumstances.

## **5. Recruitment and Selection Procedure - References**

Having carried out online searches on shortlisted candidates, the School will, where possible, obtain references prior to interview. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview. If the candidate does not wish the School to take up references in advance of the formal interview, they should notify the School at the time of applying. In such cases, any offer of employment following the formal interview will be conditional on the receipt of two satisfactory references.

The School will seek out at least two references for shortlisted candidates and will approach previous employers for information to verify particular experience or qualifications. 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. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university. No referee should be a relative or someone known to the applicant solely as a friend.

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. 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, and disciplinary record;
- whether the applicant has ever been the subject of disciplinary procedures including 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 unsubstantiated, unfounded, false 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 unsubstantiated, unfounded, false or malicious;
- whether the applicant could be considered to be involved in "extremism" (see the definition of "extremism" in the Preventing Extremism Policy, available on the School website).

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. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

If it has not been possible to obtain a reference prior to interview it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and/or the interview assessment form will be considered by the School. The applicant may be asked to provide further information or clarification before an appointment can be confirmed.

If factual references are received i.e. those which contain limited information such as job title and dates of employment, this will not necessarily disadvantage an applicant although additional references may be sought before an appointment can be confirmed.

Where references are received electronically, the School will ensure they originate from a legitimate source. The School may at its discretion make telephone contact with any referee to verify the details of the written reference provided.

The School treats all references given or received as confidential which means that the applicant will not usually be provided with a copy.

Care is taken that all school references are either countersigned or confirmed by a Senior Leader or Safeguarding Lead.

All internal candidates who apply for a contractual change of role at the School will have their application assessed in accordance with this procedure. References may be taken up on internal candidates, where relevant, as part of the application process and can be provided by colleagues as the School will be the most recent employer and will previously have taken up references from past employers.

## **6. Recruitment and Selection Procedure - Interviews**

Shortlisted applicants will be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail. All shortlisted applicants will be questioned at interview about their suitability to work with children.

Prior to interview, shortlisted candidates should be asked to complete a self-declaration form in relation to their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. Applicants will be asked to sign a declaration confirming that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

All formal interviews will have a panel of at least two people chaired by the Head or Bursar who have both undertaken safer recruitment training. The Chair of Trustees should chair the panel for the appointment of the Head or Bursar. The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Chair as to whether or not an interviewer should withdraw from the panel.

The interview will be conducted in person and the areas which it will explore will include suitability to work with children including where appropriate, any discussion of information shared by a candidate in their self-declaration form, from references, or obtained from online searches.

The School requests that all candidates invited to interview bring with them evidence of their identity, right to work in the UK, address and qualifications (see 7.1).

Candidates with a disability who are invited to interview should inform the School of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

## **7. Conditional Offer of Appointment - Pre-Appointment Checks**

If the School decides to make an offer of employment following the formal interview, in accordance with the recommendations set out in KCSIE, DUCA and the requirements of ISSRs, 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 (see 7.1);
- verification of qualifications, whether professional or otherwise, which the School takes into account in making the appointment decision, or which are referred to in the application form, whether a requirement for the role or not (see 7.1); This includes:

- Verification of professional qualifications, including Qualified Teacher Status, where appropriate;
- Verification of successful completion of statutory induction period (for teaching posts applies to those who obtained QTS after 7 May 1999);
- verification of the applicant's right to work in the UK (see 7.1);
- verification of the applicant's employment history through the interview and references (see 5 and 6 above) ;
- the School being satisfied that any information generated through online searches does not make the applicant unsuitable to work at the School (see 4);
- the receipt of two references (one of which must be from the applicant's most recent employer) which the School considers to be satisfactory (see 5);
- 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 Teaching Regulation Agency which renders them unable or unsuitable to work at the School (see 7.3);
- 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 (see 7.2.5);
- any further checks which the School decides are necessary as a result 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 (see 7.2.5);
- where the position amounts to "regulated activity (see section 7.2.2) the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory;
- where the position amounts to "regulated activity" (see section 7.2.2) 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 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 (see 7.4);
- confirmation that the applicant is not disqualified from acting as a trustee / governor or senior manager of a charity under the Charities Act 2011 (if applicable, see section 7.5);
- confirmation that the applicant is not disqualified from working in connection with early or later years' provision (if applicable, see section 7.6);
- verification of the applicant's medical fitness for the role (see section 7.7).

**\*The School is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity" (refer to section 7.2.2). The School is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, the School can also carry out an enhanced DBS check on a**

person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to "regulated activity" must therefore be considered by the School in order 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.

### 7.1 Verification of identity, address, right to work in the UK and qualifications

All applicants who are invited to an interview will be required to bring with them evidence of their identity, right to work in the UK, address and qualifications.

The School asks for this information at the interview to ensure that the person attending the interview is who they claim to be, that they are permitted to work for the School if appointed and that they hold appropriate qualifications.

**Identity and address:** all applicants must bring with them to interview, original documents which evidence their identity and address as set out below and in the list of valid identity documents in Appendix 1 (these requirements comply with DBS identity checking guidelines):

- one document from Group 1\*; and
- two further documents from either of Group 1, Group 2a or Group 2b, one of which must verify the applicant's current address;

(\*applicants must always provide their birth certificate as one form of identity unless there is a good reason why this cannot be provided).

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. They will also be required to provide their birth certificate.

The School asks for the date of birth of all applicants in order to verify identity, and check for any unexplained discrepancies in the employment and education history. The School does not discriminate on the grounds of age.

**Right to work in the UK:** all applicants must also bring to interview a valid form of evidence which confirms their right to work in the UK. Valid forms of evidence can be found in the Home Office 'Right to Work Checklist' (Right to Work Checklist ([publishing.service.gov.uk](https://publishing.service.gov.uk))).

The School will check this evidence in accordance with the Home Office 'Code of Practice on preventing illegal working: Civil penalty scheme for employers: 1 July 2021' (Code of practice on preventing illegal working ([publishing.service.gov.uk](https://publishing.service.gov.uk))).

**Qualifications:** all applicants must also bring to interview original documents which evidence any educational and professional qualifications referred to in their application form and/or which the School requests. If original/certified copies are not available, then written confirmation of the relevant qualification must be obtained from the awarding body.

### 7.2 Criminal records policy

The School will refer to the Department for Education ("DfE") document, 'Keeping Children Safe in Education' and any amended version in carrying out the necessary DBS checks.

The School complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request, or accessed here:

<https://www.gov.uk/government/publications/dbs-code-of-practice>.

A successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service ("DBS") for the position and, where appropriate, a check of the Barred List will be undertaken (see 7.2.2 below). Any offer of employment will be conditional on obtaining such satisfactory checks. Additionally, successful applicants should be aware that they are required to notify the school immediately if there are any reasons why they should not be working with children.

### **7.2.1 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.

With effect from the 29th 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 filtering rules developed by the DBS and the Home Office designate certain spent convictions and cautions as 'protected'. 'Protected' convictions and cautions are not included in the DBS certificate and job applicants are not required to disclose them during the recruitment process. It is unlawful for an employer to take into account a conviction or caution that should not have been disclosed. If a protected conviction or caution is inadvertently disclosed to the School during the recruitment process it must be disregarded when making a recruitment decision.

A conviction will always be disclosable if it was imposed for a 'specified offence' committed at any age. A caution issued for a 'specified offence' committed over the age of 18 will always be disclosable. However, a caution issued for a 'specified offence' committed under the age of 18 is never disclosable. 'Specified offences' are usually of a serious violent or sexual nature, or are relevant for safeguarding children and vulnerable adults. 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-criminal-record-check>

The filtering rules have recently been updated and work as follows:

#### **For those aged 18 or over at the time of an offence**

A spent criminal conviction for an offence committed in the United Kingdom when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by the job applicant) if:

- eleven years have elapsed since the date of the conviction;
- it did not result in a custodial sentence; and
- it was not imposed for a 'specified offence'.

A spent caution for an offence committed when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by the job applicant) if:



- six years have elapsed since the date it was issued; and
- It was not issued for a 'specified offence'.

#### **For those aged under 18 at the time of an offence**

A 'spent conviction' for an offence committed when a person was under the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant) if:

- Five and a half years have elapsed since the date of the conviction;
- It did not result in a custodial sentence; and
- It was not imposed for a 'specified offence'.

A caution issued for an offence committed when a person was under the age of 18 will never be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant).

#### **7.2.2 Regulated activity**

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;

**and**

- provides the opportunity for contact with children.

#### **Supervision**

Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if they are carried out on an unsupervised basis.

The DfE states that supervision should be:

- by a person who is in regulated activity (e.g. a teacher or classroom assistant);
- the supervision must be regular and day to day; and
- the supervision must be 'reasonable in all the circumstances to ensure the protection of children' (taking into account the age of the children, the number of children, whether or not other workers are helping to look after the children; the nature of the work, how vulnerable the children are, and the levels of supervision).

#### **Personal Care, healthcare or overnight activity**

Any role which involves personal care, healthcare, or any overnight activity, whether paid or voluntary counts as regulated activity. Regularity and supervision are of no relevance as ANY personal/health/overnight care is regulated activity. The DfE states that “*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. It is not intended that personal care includes such activities as, for example, parent volunteers helping with costumes for school plays or helping a child lace up football boots.*”

It is for the School to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances. The flow chart on page 60 of KCSIE 2023 is a helpful tool. 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.

### **7.2.3 The DBS disclosure certificate**

The DBS issues the 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 two weeks of it being received by the applicant.

Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School.

### **7.2.4 DBS Update Service**

Where an applicant subscribes to the DBS Update Service the applicant must give consent to the school to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required.

### **7.2.5 Accepting a DBS check from another educational institution**

There are limited circumstances where the school will accept a check from another educational institution which are as follows:

This is where the new member of staff (“M”) has worked in: –

- a. A school or a maintained school in England in a position which brought M regularly into contact with children or young persons;
- b. A maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or
- c. An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons,

during a period which ended not more than three months before M’s appointment.

In these circumstances the school may apply for a disclosure but is not required to do so. A new, separate barred list check will be obtained.

### ***7.2.6 Starting work pending receipt of the DBS disclosure certificate***

A short period of work is allowed under controlled conditions, at the Head's discretion. However, if an 'enhanced disclosure' is delayed, a Head may allow the member of staff to commence work:

- Without confirming the appointment;
- After a satisfactory check of the barred list if the person will be engaging in regulated activity and all other relevant checks (including any appropriate prohibition checks) having been completed satisfactorily;
- Provided that the DBS application has been made in advance;
- With appropriate safeguards taken (for example, loose supervision);
- Safeguards reviewed at least every two weeks by the Head/Bursar and member of staff;
- The person in question is informed what these safeguards are.

It is recommended, but is not a requirement, that a note is added to the single central register and evidence kept of the measures put in place.

### ***7.2.7 Applicants with periods of overseas residence***

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. The School will take into account the "DBS unusual addresses guide" in such circumstances.

For applicants who are living overseas, or who have lived overseas previously, obtaining a DBS certificate may be insufficient to establish their suitability to work at the School. In such cases the applicant will be required to provide additional information about their suitability from the country (or countries) in which they have lived. The School's policy is to request such information from each overseas country in which the applicant has lived for a period of three months or more in the previous five years.

When requesting such information the School has regard to relevant government guidance and will therefore always require the applicant to apply for a formal check from the country in question i.e. a criminal records check (or equivalent) or a certificate of good conduct.

The School recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances the School will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country.

In addition, where an applicant for a teaching position has worked as a teacher outside of the UK, the School will ask the applicant to obtain from the professional regulating authority of the teaching profession in each country in which they have worked as a teacher, evidence which confirms that they have not imposed any sanctions or restrictions on the applicant and that they are not aware of any reason why the applicant may be unsuitable to work as a teacher. The School will also ask shortlisted applicants (and their referees) to disclose whether they have ever been referred to, or are the subject of a sanction issued by, the regulator of the teaching profession in the countries in which they have carried out teaching work.

Sanctions and restrictions issued by the regulating authority of another country will not prevent a person from working as a teacher at the School. However, the School will take all relevant information into account in determining whether an applicant is suitable to work at the School.

The School may allow an applicant to commence work pending receipt of a formal check from a particular country if it has received a reference and/or letter of professional standing from that country and considers the applicant suitable to start work. Decisions on suitability will be based on all of the information that has been obtained during the recruitment process. Unless expressly waived by the School, continued employment will remain conditional upon the School being provided with the outcome of the formal check and it being considered satisfactory.

If no information is available from a particular country the School may allow an applicant to commence work if they are considered suitable based on all of the information that has been obtained during the recruitment process.

The School will take proportionate risk based decisions on a person's suitability in such circumstances. All suitability assessments must be documented and retained on file.

If the formal check is delayed and the School is not satisfied about the applicant's suitability in the absence of that information, the applicant's proposed start date may be delayed until the formal check is received.

#### **7.2.8 Data Protection obligations**

The School will comply with its obligations regarding the retention and security of records in accordance with the government DBS Code of Practice (<https://www.gov.uk/government/publications/dbs-code-of-practice>) and its obligations under the School's Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.

#### **7.3 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 Teaching Regulation Agency Teacher Services 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 Teaching Regulation Agency.

In addition the School asks all shortlisted applicants to declare whether they have ever been referred to or are the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency, or other equivalent body in the UK.

Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the Teaching Regulation Agency (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 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 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 Head. 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.

#### **7.4 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).

The School will carry out checks for section 128 directions when appointing applicants into management positions from both outside the School and by internal promotion.

This check applies to appointments to the following positions made on or after 12 August 2015:

- Head;
- teaching posts on the senior leadership team;
- teaching posts which carry a departmental head role; and
- support staff posts on the senior leadership team;
- the School will assess on a case by case basis whether the check should be carried out when appointments are made to teaching and support roles which carry additional responsibilities.

Individuals who are appointed to the Trustees body will be subject to a section 128 direction check.

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 Teaching Regulation Agency Teacher Services system. The School will use either, or both, methods to obtain this information.

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

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 or not 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.

#### **7.5 Disqualification from acting as a charity trustee or senior manager**

##### **7.5.1 Background**

Under the Charities Act 2011 it is a criminal offence for a person to act as a trustee or senior manager of a charity when disqualified from doing so. The Charities Act 2011 sets out the grounds on which a person can be disqualified from acting as a trustee or senior manager. These include various spent and unspent criminal offences and other sanctions.

### **7.5.2 Who is covered**

In addition to the school trustees, senior managers are also covered by this ruling.

Senior managers include those employees who report directly to the charity trustees or have responsibility for the overall management and control of the charity's finances. At the School the disqualification rules will be applicable to all trustees, the Head, the Bursar and potentially other senior staff who report directly to the trustees.

There is no single list or register that covers all of the disqualification criteria and the School therefore adopts a pragmatic approach to checking whether a person is disqualified. This is achieved by the use of self-declaration form and the checking of relevant publicly accessible registers.

### **7.5.3 Self declaration**

All those who are covered by the disqualification rules are required to complete a self declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria.

A failure to disclose relevant information, or the provision of false information, which subsequently comes to the School's attention may result in the termination of an appointment as a trustee or senior manager or the withdrawal of an offer of employment and may also amount to a criminal offence.

All those who are required to complete a self-declaration form are also under an ongoing duty to inform the School if there is a change in their circumstances that results or may result in them becoming disqualified from acting as a governor or senior manager.

### **7.5.4 Waiver**

A person who discloses that one or more of the disqualification criteria is applicable to them may apply to the Charity Commission for a waiver of the disqualification.

The School may at its absolute discretion withdraw an offer of employment for a senior manager or cease or terminate an appointment to the Trustee body if a waiver application becomes necessary or is rejected by the Charity Commission. The School is under no obligation to await the outcome of a Charity Commission waiver application before taking such action.

## **7.6 Childcare disqualification**

The Childcare Act 2006 (the Act) and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (the Regulations) state that it is an offence for the School to employ anyone in connection with our early years' provision (EYP) or later years' provision (LYP) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP.

### **7.6.1 Definitions**

a) EYP includes usual school activities and any other supervised activity for a child up to 1st September after the child's 5th birthday, which takes place on the school premises during or outside of the normal school day;

b) LYP includes provision for children not in EYP and under the age of 8 which takes place on school premises outside of the normal school day, including, for example, breakfast

clubs, after school clubs and holiday clubs. It does not include extended school hours for co-curricular activities such as sports activities.

DUCA states that only those individuals who are employed directly to provide childcare are covered by the Regulations. "Childcare" means any form of care for a child, which includes education and any other supervised activity for a child who is aged 5 or under. "Childcare" in LYP does not include education during school hours but does cover before and after school clubs.

### **7.6.2 Relevant roles**

Roles which will be covered by the Regulations are teaching and teaching assistant positions in EYP (Lower Prep), and those which involve the supervision of under 8s in LYP. Those who are directly involved in the management of EYP and LYP include the Head, and may also include other members of the leadership team as well as those involved in the day to day management of EYP or LYP at the School.

DUCA contains an express statement that cleaners, drivers, transport escorts, catering and office staff are not covered by the Regulations.

Some roles at the School may involve the provision of childcare in EYP or LYP on an occasional basis. They will not automatically be within the scope of the Regulations and the School will therefore consider whether they do on a case by case basis. The Regulations only apply to a limited number of roles within the School but do extend beyond employees to trustees and volunteers who carry out relevant work in EYP or LYP.

### **7.6.3 Grounds for disqualification**

The grounds on which a person will be disqualified from working in connection with EYP or LYP are set out in the Regulations. They are not only that a person is barred from working with children (by inclusion on the Children's Barred List) but also include:

- a) having been cautioned (after 6 April 2007) for, or convicted of, certain criminal offences including violent and sexual criminal offences against children and adults whether committed in the United Kingdom or overseas;
- b) various grounds relating to the care of children, including where an order is made in respect of a child under the person's care;
- c) having been refused registration for the provision of childcare (including nurseries, day care and child minding or other childcare), having been disqualified from any such registration or having had that registration cancelled;
- d) having been refused an application for registration of a children's home or having had any such registration cancelled; or
- e) having been prohibited, restricted or disqualified from private fostering.

### **7.6.4 Self-Declaration form**

All applicants to whom an offer of employment is made to carry out a relevant role in EYP or LYP will be required to complete a Self-Declaration Form confirming whether they meet any of the criteria for disqualification under the Regulations.

The School will decide whether a role is relevant and within the scope of EYP or LYP by having regard to the guidance in DUCA. Employment with the School in any relevant role

will be conditional upon completion of the Self-Declaration Form and upon the applicant not being disqualified.

The School cannot permit any person who is currently disqualified to start work in a relevant role. The School also reserves the right at its absolute discretion to withdraw an offer of employment if, in the opinion of the School, any information disclosed in the Self-Declaration Form renders that person unsuitable to work at the School.

Applicants who have any criminal records information to disclose about themselves must also provide the following information:

- a) details of the order, restriction, conviction or caution and the date that this was made;
- b) the relevant court or body and the sentence, if any, which was imposed; and
- c) a copy of the relevant order or conviction.

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 7.2.1 above).

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 "to the best of their knowledge".

#### ***7.6.5 Waiver of a disqualification***

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 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.

#### ***7.6.6 Retention of disqualification information***

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.

#### ***7.6.7 Continuing duty to disclose change in circumstances***

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.

#### ***7.7 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 to whom an offer of employment is made must complete a Health Questionnaire. The information contained in the questionnaire will then be held by the School



in strictest confidence and processed in accordance with the Recruitment Privacy Notice and Data Protection Policy.

This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role e.g. proposed workload, extra-curricular activities, and/or layout of the School.

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

## **8. Contractors and agency staff**

### **8.1 Contractors and agency staff undertaking regulated activity**

The School must ensure that the same checks are completed for contractors (and their employees) undertaking regulated activity (see 7.2.2) at the School as it does for its own employees. The School requires written confirmation from the contractor that it has completed these checks on all of those individuals whom it intends will work at the School before any such individual can commence work at the School.

Agencies who supply staff to the School must also complete the pre-employment checks which the School would otherwise complete for its staff. Again, the School requires confirmation that these checks have been completed before an individual can commence work at the School.

The Single Central Register shows these checks have been made and the School independently verifies the identity of individuals supplied by contractors or an agency and, in the case of supply staff, requires the provision of the DBS disclosure certificate before those individuals can commence work at the School.

### **8.2 Contractors and agency staff not undertaking regulated activity**

A contractor not undertaking regulated activity (see 7.2.2) will usually work out of hours with no opportunity for contact with children. Where a contractor needs to work on site during school hours, the School will determine the appropriate level of supervision depending on the circumstances.

Contractors or agency staff who are not engaged in regulated activity will still need their ID verified.

### **8.3 Additional checks on contractors and agency staff**

In addition to safeguarding checks, the School will also carry out all other relevant checks such as checks on competency, necessary insurance cover and health and safety practices.

## **9. Trustees**

The School is governed by a board of Trustees, so the appointment of a new Trustee is a serious matter for the school.

### **9.1 The initial stage**

When a potential Trustee has been identified, and they have expressed an interest; s/he will be invited to visit the School and to meet the Head informally, and to have a tour of the school. If the Chair of Trustees is not present at that stage, s/he will probably arrange a separate informal meeting, perhaps in the company of another, experienced Trustee. The aim at the informal meeting is to ensure that every prospective Trustee has a clear understanding of the commitment expected of him or her, in terms of time and attendance and is given sufficient material about the School to allow a well-informed judgement to be made before committing themselves to the appointment process. All

potential candidates will also be informed of the range of statutory checks that are required as part of the appointment process.

## 9.2 The appointment process

Prospective Trustees are interviewed by two or three senior Trustees who recommend all appointments to the full Governing Body. Care is taken to select Trustees who are prepared to serve for approximately three to five years and to be prepared to commit the time necessary to get to know the school.

All new appointments are formally recorded in the minutes of the Board and a formal letter of appointment is sent to the new Trustee.

## 9.3 Statutory checks

The Bursar, in his/her role as Clerk to Trustees, will obtain the following from the new potential Trustee before their appointment is confirmed:

- an enhanced DBS certificate;
- if the Trustee will be undertaking a regulated activity, a barred list check (see 7.2.2);
- if the Trustee will be undertaking a regulated activity and has worked or been resident overseas, the School will carry out such checks and confirmations that it considers appropriate, so that any relevant events that occurred outside the UK can be considered;
- any Trustee working in EYP or LYP, whether or not they are engaging in regulated activity, will be required to sign a declaration that they are not disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006 (see 7.6).
- evidence of their entitlement to work in the UK, where relevant;
- confirmation that they are not disqualified from acting as a Charity Trustee or Company Director, for example by virtue of an undischarged bankruptcy;
- evidence that the Trustee has not been prohibited from participating in the management of independent schools;
- if the new Trustee is also to be appointed as a Company Director, a completed Form AP01 (downloadable from <https://www.gov.uk/government/publications/appoint-a-director-ap01>) will be sent to Companies House to register the appointment.

## 9.4 Checks regarding the Proprietor and Chair of Trustees

If the Proprietor or Chair of Trustees, is to change, the school will ensure that the DfE obtains an enhanced criminal records check, and checks both the individual's identity and right to work in the UK before he or she takes up the appointment. Further overseas checks are required if the person lives or has lived outside the UK.

The Chair's disclosure application has to be made by the DfE; the school cannot handle it as they would for all other Trustees. So, even if a Trustee, whom the school has already checked, becomes Chair, the DfE has to make yet another check.

## 9.5 Induction of Trustees

The School arranges for all new Trustees to receive a thorough induction in child protection and in the compliance and fiduciary duties of governance. New Trustees spend time at the School in order to meet staff and pupils and to gain an insight into the curriculum.

## 9.6 Data Protection

The School will comply with its obligations under the relevant data protection legislation. The Trustees' attention should be drawn to the Staff Privacy Notice and Data Protection Policy which set out details of how the School will process Trustees' personal data.

## 10. Volunteers

Volunteers bring with them a range of skills and experience that can enhance the learning opportunities of pupils. The kinds of activities that volunteers may assist with are hearing pupils read, working with small groups of pupils to assist them in their learning, working alongside individual pupils, as an additional tutor, or accompanying school visits.

### 10.1 Safeguarding checks

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 section 7.2.2 above will be applied to all volunteers). If the volunteer will be undertaking a regulated activity and has worked or been resident overseas, the School will carry out such checks and confirmations that it considers appropriate, so that any relevant events that occurred outside the UK can be considered.

KCSIE 2023 states that there is no legal requirement for a volunteer not engaged in regulated activity to obtain a DBS certificate, though an enhanced DBS may be obtained (KCSIE p64). However, Barred list information must not be requested on any person who is not engaged in regulated activity (KCSIE p62).

Any volunteer working in EYP or LYP, whether or not they are engaging in regulated activity, will be required to sign a declaration that they are not disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006 (see 7.6).

The school may also 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 and/or child protection induction.

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.

### 10.2 Data Protection

The School will comply with its obligations under the relevant data protection legislation. Volunteers' attention should be drawn to the Staff Privacy Notice and Data Protection Policy which sets out details of how the School will process personal data.

## 11. Visiting speakers

The School invites outside speakers to give talks to enrich our pupils' experience. The School recognises the enormous benefit gained by pupils from speakers from all walks of life.

### 11.1 Safeguarding checks

The School is not permitted to obtain Children's Barred List information on any visiting speaker who does not engage in regulated activity at the School, though a DBS check may be requested if relevant.

All visiting speakers are required:

- to sign in and out at Reception,
- to provide an original current photo ID such as a passport or driving licence
- to wear a visitors' badge at all times, and
- be escorted and fully supervised by a fully vetted member of staff. At no point will a Visiting Speaker be left unsupervised on School site whilst pupils are present.

### 11.2 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 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."*

Any member of staff inviting in a visiting speaker or overseeing a group of pupils who would like to invite in a visiting speaker, must at a minimum carry out an internet search on the proposed speaker. Pupils may not invite visiting speakers – this must be done through a member of staff. The External Speaker Checks Register must be completed and submitted to the Head/Bursar in a timely manner for him/her to approve the event.

If the internet search reveals information that indicates the speaker presents a risk of radicalisation then the matter must be referred to the Head. The School will not use a Visiting Speaker where any link is found to extremism, such as extremist groups and movements.

### 11.3 Topic suitability

The staff member inviting the speaker must be familiar with the subject topic on which the visiting speaker will present and ensure that it is appropriate for the audience. If there are any questions about the suitability of the subject matter this must be discussed with the Head before the talk occurs.

A member of school staff will be present during the visit/talk, who will monitor what is being said to ensure that it aligns with the values and ethos of the school and British values. In the unlikely event that the talk/presentation does not meet this requirement, Visiting Speakers will be informed that school staff have the right and responsibility to interrupt and/or stop a presentation. The member of staff will report this to the Head as soon as reasonably practicable after the talk/visit.

## 11.4 Data Protection

The School will keep a formal register of visiting speakers, which will include their contact details, date of the online search and information on the subject matter of their presentations. Any information gathered will be kept in accordance with the School's Data Protection Policy and the Staff Privacy Notice.

## 12. Policy on the recruitment of ex-offenders

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 section 12.2 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 7.2.1 above).

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.

### 12.1 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;
- whether the conviction or caution is 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020 (if yes, it will not be taken into account);
- 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 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.

### **12.2 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 the Bursar or the Head 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.

### **12.3 Data Protection obligations**

The School will comply with its data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice and the Data Protection Policy

## **13. Whistleblowing**

All staff 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). All staff receive training so that they understand the School's expectations. Safeguarding children is at the centre of the School's culture and concerns should always be raised in accordance with the School's Safeguarding Policy.

## **14. Referrals to the DBS and Teaching Regulation Agency**

This policy is primarily concerned with the promotion and practice of safer recruitment. However, applicants should also be aware that the School has legal responsibilities to fulfil when employment comes to an end. In particular, the School has a legal duty to make a referral to the Disclosure and Barring Service (DBS) where:

- an individual has applied for a position at the School despite being barred from working with children; and/or
- an individual has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

The DBS will consider whether to impose sanctions on that individual which may restrict or prevent them from working with children in future.

In addition, if a teacher is dismissed because they are found to have committed serious misconduct, or they have breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will make a referral to the Teacher Regulation Agency.

The Teaching Regulation Agency will consider whether to impose a prohibition from teaching order.

### **15. Queries**

All queries regarding the School's Application Form, the recruitment process, and this policy must be directed to the Bursar.

Authorised by	Catriona Buchanan
Date	Jan 2024

Review date	Jan 2025
Circulation	Via website

## APPENDIX 1 LIST OF VALID IDENTITY DOCUMENTS

### **Group 1: primary identity documents**

- current valid passport
- biometric residence permit (UK)
- current driving licence (photocard - full or provisional (UK / Isle of Man and Channel Islands)
- birth certificate - issued within 12 months of birth (UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces)
- adoption certificate (UK and Channel Islands)

### **Group 2a: trusted government documents**

- current driving licence (photocard - full or provisional - all countries outside the UK excluding Isle of Man and Channel Islands)
- current driving licence (paper version if issued before 1998 – full or provisional ; UK / Isle of Man and Channel Islands)
- birth certificate - issued after time of birth (UK, Isle of Man and Channel Islands)
- marriage / civil partnership certificate (UK and Channel Islands)
- immigration document, visa or work permit (issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa / permit must relate to the non UK country in which the role is based)
- HM Forces ID card (UK)
- firearms licence (UK, Channel Islands and Isle of Man)

All driving licences must be valid.



### **Group 2b: Financial and social history documents**

- mortgage statement (UK)\*\*
- bank / building society statement (UK and Channel Islands)\*
- bank / building society statement (countries outside the UK)\*
- bank / building society account opening confirmation letter (UK)\*
- credit card statement (UK)\*
- financial statement - e.g. pension or endowment(UK)\*\*
- P45 / P60 statement (UK and Channel Islands)\*\*
- council tax statement (UK and Channel Islands)\*\*
- letter of sponsorship from future employment provider (non UK; valid only for applicants residing outside the UK at the time of application; must be valid at time of application)
- utility bill (UK; not mobile telephone bill)\*
- benefit statement - e.g. child benefit, pension (UK)\*
- a document from central or local government/ government agency / local council giving an entitlement - e.g. from the Department for Work and Pensions, the Employment Service , HM Revenue & Customs, (UK and Channel Islands) \*
- EEA national ID card (must be valid at time of application)
- Irish passport card (cannot be used with an Irish passport; must be valid at time of application)
- cards carrying the PASS accreditation logo (UK, Isle of Man and Channel Islands; must be valid at time of applications)
- letter from Head or College Principal (UK for 16-19 year olds in full-time education. This is only used in exceptional circumstances if other documents cannot be provided; must be valid at time of application).

### **Note**

If a document in the list of valid identity documents is:  
denoted with \* - it should be less than three months old  
denoted with \*\* - it should be less than 12 months old