HARROW INDEPENDENT COLLEGE
School of Mathematics, Science & Economics

Harrow Independent College (HIC)'s

Policy for Safer Recruitment

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Policy Statement

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of the children in education.

HIC is committed to safeguarding and promoting the welfare of children and young people, and expects all staff and volunteers to share this commitment. The post is subject to an enhanced Disclosure Application to the Disclosure and Barring Service and check against the ISA Barred List for children.

It is recognised that this can only be achieved through sound procedures, good interagency cooperation and the recruitment and retention of competent, motivated employees who are suited to, and fulfilled in the roles they undertake.

This college recognises the value of, and seeks to achieve a diverse workforce which includes people from different backgrounds with different skills and abilities. The college is committed to ensuring that the recruitment and selection of all who work within the college is conducted in a manner that is systematic, efficient, effective and promotes equality of opportunity. The college will uphold its obligations under law and national collective agreements not to discriminate against applicants for employment on the grounds of age, sex, sexual orientation, marital status, disability, race, colour, nationality, ethnic origin, religion or creed.

This document provides a good practice framework to comply with the principles set down in the college's Equal Opportunity Policy.

Key Points to Recruitment Process

It is the policy of the college to recruit the most suitable candidate in accordance with the Equality Act (2010), regardless of sex, age, ethnic origin, sexual orientation, belief, religion, disability or any other protected characteristic and regardless of membership of a professional or trade union.

All posts open to external candidates are appropriately advertised. Applications for externally advertised posts are also encouraged from internal candidates. Equal consideration is given to internal candidates when short-lists are drawn up.
HIC complies with the requirements of the Counter Terrorism and Security Act to have due regard for the need to prevent people being drawn into terrorism and will act in accordance with its Prevent duty.

Safer Recruitment and DBS checks – policy and procedures

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

New Staff

When appointing new staff, we will:

- Verify their identity ***(using checking guidelines on the gov.uk website)***
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available and provide appropriate supervision if this is the case
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK **(following advice on the gov.uk website).** 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. For teachers, we will use the teacher services' system to verify any award of qualified teacher status and the completion of teacher induction.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher (or any sanction or restriction imposed that remains current). This check to also be carried out on staff working as 'unqualified teachers'. Checks to be carried out via the Teacher Services' web page.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- An additional social media check is carried out to identify any potential concerns or queries at shortlisting stage.

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.

Safer Recruitment Training

We ensure that every appointment panel includes, at least, one member who has received safe recruitment training. The training is updated ***at least*** every three years.

Advertising a position
All adverts released by the college have the following safeguarding paragraph, detailing the college's commitment to safer recruitment. Clear Job descriptions and/or job profiles are always part of the advert.

HIC is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The post is subject to an enhanced Disclosure Application to the Disclosure and Barring Service and check against the ISA Barred List for children.

Applications
The college uses a standard Harrow Council Application form. CVs only will not be accepted.

We ask for written information about previous employment history and check that information is not contradictory or incomplete. Where an applicant is shortlisted, these gaps will always be discussed at interview.

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 possible referral to the police and other professional regulatory bodies.

References
We will seek references (one of which must be from the candidate's current employer and preferably from a senior person with appropriate authority) on all short-listed candidates, including internal candidates, ***before interview***. Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving should be obtained. We do not accept open references. We will scrutinise these and resolve any concerns before confirming appointments by contacting the referee. The references requested will ask specific questions about the suitability of the applicant to work with children. Procedures from 'Keeping Children Safe in Education Sept 2023' are followed.

HIC uses a standard letter for reference requests and this includes questions about:
• the referee's relationship with the candidate
• whether the referee is completely satisfied that the candidate is suitable to work with children and, if not, for specific details of the concerns and the reasons why the referee believes that the person might be unsuitable.

Referees will also be asked to confirm details of:
• the applicant's current post and salary
• performance history and conduct
• any disciplinary procedures in which the sanction is current
• any disciplinary procedures involving issues related to the safety and welfare of children, including any in which the sanction has expired and the outcome of those
• details of any allegations or concerns that have been raised that relate to the safety and welfare of children or behaviour towards children and the outcome of these concerns

Interviews
The selection process and interview questions are structured around the job description, staff suitability and safeguarding questions.

Existing staff
If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.
We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- 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

We require staff who are convicted or cautioned for any offence during their employment with the college to notify the college, in writing of the offence and the penalty (this forms part of our staff code of conduct). This will then be risk assessed (see appendix 1)

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

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

Trainee/student teachers
Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.
Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.
In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers
We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought
- A volunteer application form will need to be completed

Governors
All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

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

Appendix 1:

DBS Risk Assessment Checklist

Starting work prior to DBS Certificate being seen
This risk assessment should be completed when considering whether to allow a new member of staff to start work before a new DBS certificate has been seen by the school.

Name of Person: .....

Role: .....

Interview Date: .....

Proposed Start Date: .....
DBS Check application date: .....
[The person must not start without an application being made]

Is the person in 'Regulated' Activity? Yes ☐ No ☐

Reason for starting without seeing a new DBS Check

☐ Continuity of the school's provision to pupils

☐ Other (please state) .....

Known Information

☐ Have all the following checks been satisfactorily completed? Identity

☐ check (photographic) [Essential]

☐ Verification of current address [Essential]

☐ Barred list check (if legally appropriate) [Essential]

☐ Prohibition check (for teachers) [Essential]

☐ Overseas checks (where relevant)

☐ Right to Work in the UK [Essential]

☐ Confirmation of qualifications [Essential]

☐ *Two* references [Essential]

☐ Any other information (please state) .....
.....
.....

Previous DBS Certificate
If the person has a previous DBS, on what date was it issued? .....

When was the person's last day at work in their previous school or college?
.....

If the person's proposed start date and their last day at their previous school or college are less than three months apart, then a new Enhanced DBS check is not required in law, although most schools will instigate a new one. Therefore, given that there is sufficient other information, the person could be assessed to be of low risk.

Decision

☐ **High Risk** – Person **should not** be allowed to start without a new Enhanced DBS, as there has been a break in service of more than three months (or they do not have an Enhanced DBS certificate) and/or there is insufficient information about the person in the 'Known Information' list above.

☐ **Medium Risk** – Person may start work and although there is sufficient other information listed above, because there is a gap in service of three months or more (or they do not have an Enhanced DBS certificate), the person must be supervised* at all times and **should not** undertake 1:1 work, personal care activities or residential visits. (* The unchecked person must always be 'within sight and hearing' of a person with an Enhanced DBS check).

☐ **Low Risk** – Person may start work, without additional supervision, as they already hold an Enhanced DBS check and there is no break in service of three months or more and all other checks have been satisfactorily completed.

Authorisation

Headteacher (Print Name): .....

Headteacher (Signature): .....

Date: .....

Chair of Governors (Print Name): .....

Chair of Governors (Signature): .....

Date: .....