

STAFF SAFER RECRUITMENT POLICY

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1. <u>Safe recruitment of staff (including volunteers and governors)</u>

Trent College and The Elms ("the school") are committed to safeguarding the welfare of all children and young people as outlined in the latest version of Keeping Children Safe in Education ("KCSIE") and the Prevent Duty. DfE Departmental advice for schools and childcare providers expects all staff and volunteers to share this commitment.

We are committed to promoting and supporting positive pupil mental health and wellbeing through our policies and practice. Our first consideration, as professional, adult practitioners, will be how our actions support and promote the wellbeing of every child.

The school aims to recruit staff that share and understand our commitment and to ensure that no job candidate is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

All queries on the school's Application Form and recruitment process must be directed to the school's Head of HR.

An entry will be made on the Single Central Register for all current members of staff at the school, the governors and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.

All checks will be made in advance of appointment or as soon as practicable after appointment. Where all checks have not been completed a Risk Assessment must be undertaken and agreed by either the Head of Trent or The Elms or the Bursar.

2. Scope of this policy

The Staff Safer Recruitment Policy 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.

In the case of agency or contract workers, the school should set out their safeguarding requirements in the contract between the organisation and the school and must obtain written confirmation from the agency or company that it has carried out the same checks as we would otherwise perform on any individual working at the school (or who will be providing education on the school's behalf, including through online delivery). The school conducts identity checks

on agency and contract workers on arrival in school and, in the case of agency workers which includes supply staff, the school must be provided with a copy of the appropriate level of DBS check for such staff if it discloses any matter or information.

The school will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure – renewed every three years, right to work in the UK, barred list, prohibition, qualifications, overseas checks plus those checks set out in KCSIE as 'pre-employment' checks) before they are permitted to carry out work for the school. The Single Central Register shows these checks have been made and the school carries out its own identity check and whether a copy of the DBS certificate has been presented (whether or not it discloses any information).

In respect of contractors, unchecked contractors will under no circumstances be allowed to work unsupervised in school. The school will determine the appropriate level of supervision depending on the circumstances. The school will conduct appropriate risk assessments.

Certain individuals are automatically disqualified from acting in senior management positions within a charity. Whether an individual falls into the category of a senior management position is judged using the following criteria:

- A person who is accountable only to the governors, and who carries overall responsibility for the day-to-day management and control of the charity. At Trent College and The Elms this would be the Head.
- A person who is accountable only to the Head or the governors, and who is responsible
 for the overall management and control of the charity's finances. At Trent College and
 The Elms this would be the Bursar.

Being disqualified means that a person can't take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or 'waived') the disqualification.

Any staff who TUPE transfer into the school's staff will be required to undertake the statutory requirements with regard to safer recruitment checks.

If staff are transferred under TUPE (gap of three months or less and information complete) information will be passed to the new employer and a note made on the Single Central Register that details have been accepted under TUPE.

3. Application for a post

Job vacancies when advertised will include a statement outlining the school's commitment to safeguarding and promoting the welfare of children and young people and the expectation that all staff and volunteers share this commitment. The school will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms.

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. Candidates for employed posts will receive a Job Description and Person Specification for the role applied for.

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 successful candidate will be required to confirm their identity documents via an online DBS application process from the Disclosure and Barring Service ("DBS") for the position and, where appropriate, a check of the Barred List will be undertaken. Any offer of employment will be conditional on obtaining such satisfactory checks. Additionally, successful candidates should be aware that they are required to notify the school immediately if they are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration.

The statutory guidance "Disqualification under the Childcare Act 2006" applies to those providing early years childcare or later years childcare, including before school and after school

clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

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

Staff and/or successful candidates who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed.

If the candidate is currently working with children the school will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.

If the candidate is not currently working with children but has done so in the past, the school will ask the previous employer about those issues. 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.

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.

4. <u>Invitation to Interview</u>

The school will shortlist candidates 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.

As part of the shortlisting process, the school will carry out an online search on shortlisted candidates as part of its due diligence (candidates will be informed of this). This may help to identify any incidents or issues that have happened, and are publicly available online, which the school may want to explore with an candidate at interview. This forms 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.

Shortlisted candidates will then be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail.

Candidates will be asked to complete a self-declaration 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. Candidates 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.

The school will, where possible, obtain references prior to interview or, in any case, on conditional offer of employment. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview or shortly thereafter.

All formal interviews will have a panel of at least two senior staff and will follow planned questions. At least one of the panel members will have undertaken safer recruitment training. The Chair of Governors should chair the panel for the Bursar's/Head's appointment. 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, except in exceptional circumstances, and the areas which it will explore will include suitability to work with children. Any discussion of information shared by a candidate in their self-declaration form will take place with HR. Any gaps in employment or frequent changes in employment will be included in questioning at interview.

5. <u>Verification of identity, address, right to work in the UK and qualifications</u>

All candidates invited to interview are required to bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

The school requests that all candidates invited to interview also bring with them original documents which evidence their identity and address as set out below and in the list of valid identity documents at 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; and

(*applicants must always provide their birth certificate as one form of identity unless there is 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.

All candidates 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)) and in some cases the evidence of your right to work in the UK can also be used as evidence of your identity and address for DBS identity checking purposes.

The school will check evidence of your right to work in the UK in accordance with the Home Office 'Code of Practice on preventing illegal working: Civil penalty scheme for employers: 6 April 2022' (which can be found here: https://www.gov.uk/government/publications/illegal-working-penalties-codes-of-practice-for-employers).

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.

6. <u>Conditional Offer of Appointment: Pre-Appointment Checks</u>

As part of the recruitment process, all staff and volunteers (collectively referred to as "candidates" for the purposes of this policy) who work within the school will have their suitability to work with children assessed. An enhanced DBS check will be required for candidates who will be engaged in regulated activity. In summary "regulated activity" means if as a result of their work they:

- will be responsible, on a regular basis in school, for teaching, training instructing, caring for or supervising children; or
- will carry out paid, or unsupervised unpaid, work regularly in school where that work provides an opportunity for contact with children; or
- engage in intimate or personal care or overnight activity, even if this happens only once.

In some cases a candidate will be supervised to such a level that they are not in regulated activity. The school will need to consider:

- whether the individual will be supervised by a member of staff in a regulated activity, and whether the supervision will be regular and day to day;
- whether the supervision will be reasonable in all the circumstances to ensure the protection of children: and

whether the supervised individual is a volunteer.

Any offer to a successful candidate will be conditional upon:

- 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 candidate's identity (where that has not previously been verified);
- 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;
- verification of the candidate's employment history;
- the school being satisfied that any information generated through online searches does not make the candidate unsuitable to work at the school;
- the receipt of two references (one of which must be from the candidate's most recent employer) which the school considers to be satisfactory;
- for positions which involve "teaching work", information about whether the candidate 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;
- for candidates who have carried out teaching work outside the UK, information about whether the candidate has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at the school;
- where the position amounts to "regulated activity" (see above) the receipt of an enhanced disclosure from the DBS which the school considers to be satisfactory;
- where the position amounts to "regulated activity" (see above) confirmation that the candidate is not named on the Children's Barred List;
- information about whether the candidate 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 candidate has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at the school;
- confirmation that the candidate is not disqualified from acting as a trustee / governor or senior manager of a charity under the Charities Act 2011;
- confirmation that the candidate is not disqualified from working in connection with early or later years provision;
- verification of the candidate's medical fitness for the role;
- verification of the candidate's right to work in the UK; and
- any further checks which the school decides are necessary as a result of the candidate having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.

It is the school's practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by the school in strictest confidence and processed in accordance with the Privacy Notice – Staff and Governors 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 i.e. 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.

7. References

The school will seek the references referred to in section 6 above for shortlisted candidates (including internal candidates) and will approach previous employers for information to verify particular experience or qualifications, before interview, or as soon as possible thereafter. One of the references must be from the candidate's current or most recent employer. References must be received by a senior person with appropriate authority. If the candidate does not wish the school to take up references in advance of the interview, they should notify the school at the time of applying.

Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

The school will ask all referees if the candidate is suitable to work with children and to provide facts of any substantiated safeguarding concerns/allegations that meet the harm threshold set out in Part 4 of the statutory guidance 'Keeping Children Safe in Education'. Substantiated allegations that meet the harm threshold should be included in references. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated, or malicious should not be included in any reference.

The school will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the candidate or on open references or testimonials. The school will verify all references. Where references are received electronically, the school will ensure they originate from a legitimate source.

The school will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.

All references received from a school must be countersigned by the Head of that school.

8. <u>Criminal Records Checks</u>

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 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The 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 a 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.

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).

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. Original certificates should not be sent by post. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the school.

Where an candidate subscribes to the DBS Update Service the candidate 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.

If disclosure is delayed

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 working 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 risk assessment and safeguarding conditions taken;
- 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; and
- As a recommendation, that a note is added to the single central register and evidence kept of the measures put in place.

9. <u>Childcare Disqualification</u>

The Childcare Act 2006 (Act) and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (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.

Further information for candidates can be found here:

 $\frac{https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006$

Roles which will be covered by the Regulations are teaching and teaching assistant positions in EYP, 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 governors and volunteers who carry out relevant work in EYP or LYP.

All candidates to whom an offer of employment is made to carry out a relevant role in EYP or LYP or employed to work at The Elms 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.

Candidates 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

10. Retention, Security of Records and Data Protection Obligations

The school will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy.

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 Privacy Notice – Staff and Governors and the Data Protection Policy.

11. Monitoring

- The monitoring of the Safer Recruitment Policy is undertaken by the Bursar, who line manages the Head of HR. The Bursar will, prior to any new member of staff/volunteer commencing work at the school, check the individual is entered correctly onto the Single Central Register (SCR) and that all necessary dates for recruitment checks have been entered into the SCR in accordance with the Independent Schools Standards Regulations. The Head of HR will share the staff/volunteer file with the Bursar for verification.
- Both Heads will undertake a termly visit (either jointly or individually) to the HR
 Department to examine the school's SCR and audit a sample of staff files to ensure they
 are compliant with all current regulations.
- On behalf of the Board of Governors, one governor from the Child Protection, Welfare &
 Boarding Committee and one governor from the Compliance & Risk Committee will each
 undertake an annual monitoring visit to the HR Department to examine the school's SCR
 and audit a sample of staff files to ensure they are compliant with all current regulations.
 The Board of Governors may delegate this monitoring visit to an external paid consultant,
 who will provide a report directly to the Chair of Governors.

The annual monitoring of the SCR will be entered into the minutes of the main Board at the meeting where the report of the Governor's monitoring visit will be tabled.

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)
- fire arms 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 only; 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 the application)
- 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

Appendix 2

Policy on the Recruitment of Ex-Offenders

The school will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. The school makes appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar them from employment within the school. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All positions within the school are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All candidates 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.

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 attempt to apply for a position within the school. The school will report the matter to the Police and/or the DBS if:

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

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

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the candidate has a pattern of offending behaviour or other relevant matters;
- whether the candidate'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 convicted person.

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, serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the school's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the school's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last 10 years.

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by a candidate 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 and the Head of the school before a position is offered or confirmed.

If a candidate wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the candidate 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 candidate has had a reasonable opportunity to challenge the disclosure information.