



Safer Recruitment Policy

A Whole-School policy including EYFS

Approved by:	Fergus Llewellyn, Headmaster
Last reviewed:	September 2024
Next review:	September 2025
Reviewed by the main board of Governors and signed by the Chairman annually. Last Review:	Main Board Meeting Dec 2020
Next review by Governors:	Main Board Meeting
Reviewed annually or with government change.	

Designated Safeguarding Leads (DSL):

DSL – Michael Matthews

Deputy DSL- Fergus Llewellyn (Headmaster)

Deputy DSL – Mrs Caroline Park, Director of Pupil Welfare/Wellbeing

Deputy DSL – Henry Tresidder, Head of Pastoral Tracking/Enrichment

Deputy DSL EYFS- Louise Hackett & Yasmin Mellet (Nursery)

In the absence of the DSL, the DDSL will cover the activities of this role.

1. Introduction

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share in this commitment. The School seeks to attract, select and retain employees who will contribute positively to the ethos of the School and are committed to school improvement. A motivated and committed workforce with appropriate knowledge, skills, experience and ability to do the job is critical to the School's success.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

2. Purpose and Scope

To ensure the recruitment of both permanent and fixed term staff (including voluntary) is conducted in a fair and effective manner. To achieve this purpose, those that are responsible for each stage of the recruitment process will demonstrate a professional approach by dealing fairly with all applicants. This policy applies to all school employees and governors responsible for and involved in recruitment and selection of all staff. The ultimate responsibility for recruitment and selection lies with the governing body.

The objective of the recruitment process is to attract, select and retain staff who will contribute positively to the future development of the School. The first experience an individual has is important, therefore the experience should be positive and all those responsible for recruiting will aim to:

- Leave a positive image with unsuccessful applicants.
- Give successful applicants a clear understanding of the post and that which is expected of them.
- Reduce the risk of a poor selection decision that can be expensive and may cause line management problems in the future or may not meet the School's commitment to safeguard children.

3. Application Process

Cumnor House Sussex is required by law to follow the Department for Education (DfE) statutory guidance "Keeping Children Safe in Education 2024" and the Independent Schools Inspectorate (ISI)

Regulatory Requirements which demand a detailed check of a candidate's background and previous employment.

Application forms will include:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Candidates will only be invited for interview once they have completed the Application Form in full. A covering letter should accompany the application form.

The School reserves the right to fill a position before the stated closing date should the right candidate be identified.

Candidates should be aware that all posts in the school involve a responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post.

Accordingly, all posts are exempt from the Rehabilitation of Offenders Act 1974 and therefore all convictions, cautions and bind-overs, including those regarded as 'spent', must be declared.

An accurate job description is required for all posts. A person specification, which is a profile of the necessary requirements for the post, may also be used.

4. Advertising

When advertising roles, we will make clear:

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

5. Shortlisting

All applications will be considered by at least two appropriate senior members of staff to ensure that:

- They are fully and properly completed
- The information provided is consistent

- The information provided does not contain any discrepancies or inconsistencies;
- Any gaps in employment are identified; and
- Any potential concerns are identified and explored

Incomplete applications will not be accepted and will be returned for completion.

As well as reasons for gaps in employment, the reasons for a history of repeated changes of employment without any clear career or salary progression, or a mid-career move from a permanent post to supply teaching or temporary work, will also be noted and will need to be explored and verified during the later stages of the process.

All candidates will be assessed equally against the criteria contained in the person specification and a short-list will be drawn up.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

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

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

6. References

References will be sought prior to interview on all short-listed candidates, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview. References will always be obtained from the candidate's current employer. References should always be requested directly from the referee and from a senior person with appropriate authority, not just a colleague.

The purposes of seeking references is to obtain objective and factual information to support appointment decisions, such as employment dates and previous experience. Upon receipt, references should be checked to ensure that all specific questions have been answered satisfactorily. Verbal contact is to be made with the referee who is the current or most recent employer to confirm that their reference is authentic and to clarify any points in the reference that are vague or unspecific. Where there are vague or unspecific points in other references then these

should also be verbally checked. In the case of volunteers then a verbal check should be made with at least one referee.

If you are currently working with children, on either a paid or voluntary basis, your current employer will be asked about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time-expired), and whether you have been the subject of any child protection allegations or concerns and, if so, the outcome of any enquiry or disciplinary procedure. If you are not currently working with children but have done so in the past, that previous employer will be asked about such matters. Where neither your current nor previous employment has involved working with children, your current employer will still be asked about your suitability to work with children, although it may be appropriate for them to answer “not applicable” if your duties have not brought you into contact with children or young persons.

When seeking references, we will:

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

7. Online Searches

Online searches may be carried out on shortlisted candidates as part of the safer recruitment and due diligence process. Shortlisted candidates will be notified that they will be subject to an online check if appropriate and that anything of concern will be discussed with them during interview. These checks will be carried out by HR.

Prohibition from Teaching Check

The School must check that a prospective member of the Teaching Staff is not subject to a prohibition order issued by the Secretary of State. This is carried out by the Head of HR and entered on the Central Single Register (SCR).

Section 128 Check

The School must check whether staff appointed to management positions (**including internal promotions**) are subject to a prohibition from management of independent schools’ direction also

known as Section 128 Directions. The following staff are considered to be in management positions for the purpose of this check:

- Head Teacher
- Senior Leadership and Management Teams
- Heads of Departments
- Governors

Completion of Induction (for teaching posts)

Verification of successful completion of statutory induction period (applies to those who obtained QTS after 7th May 1999)

8. Invitation to Interview

We are an equal opportunities employer and welcome applications from all candidates. All our prospective employees are asked to complete an identical pre-interview medical declaration, which is part of the application form. All candidates for teaching and non-teaching posts are also requested to complete a more detailed medical form once an offer of a post at Cumnor House Sussex has been provisionally made and accepted. The school may also request a health report from your G.P after a position has been offered and accepted. You should bear in mind that the law provides that you must consent before a medical report can be obtained by the school from your doctor for employment purposes, and that you are entitled to see your report.

This form, together with the post-offer medical form, is stored in your personal file securely in our HR Office. Access is restricted to the Headmaster, HR Manager and School Nurse. Thereafter, they will form part of an employee's medical records. They may be viewed on request by a statutory body but will otherwise not be disclosed to any third party. Medical records are securely destroyed after an individual leaves the employment of the school unless they are considered relevant to any safeguarding concerns.

If you are invited to interview, the areas which will be explored will include suitability to work with children as well as suitability to meet the Job Specification.

Prior to the interview and selection process candidates will be given any relevant information e.g details of any selection methods that will be used. Candidates who have a disability or any other special needs will be given a chance to highlight this prior to the process in order that reasonable adjustments may be made to the recruitment process.

- Candidates invited to interview must bring documents confirming both educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of degree and A-level certificates, diplomas etc.). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained from the awarding body.
- Candidates invited to interview must also bring original identification documents with them i.e. passport and/or driving licence or birth certificate. If applicable, documentation (such as marriage certificate) evidencing a change of name.

- All shortlisted applicants will be asked to disclose any relevant spent or unspent convictions and cautions prior to interview using the Criminal Records Self-Disclosure Form (Appendix 1). This form should be returned to the school and signed in front of the Head of HR.

9. Interviews

It is a requirement that at least one member of the selection team has completed the Safer Recruitment Training successfully prior to the start of the recruitment process

The interview will assess the merit of each candidate against the job requirements, and explore their suitability to work within a childcare setting.

Whilst an interview is always likely to be used as the primary feature of the selection process the selection panel will consider whether any additional selection methods are required to supplement the interview. These may include presentations, teaching observation, interaction with pupils, interactions with team members, in-tray exercises, verbal or numerical tests, according to the requirements of the role.

Interviewers will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made
- Have the necessary authority to make decisions about appointments
- Be appropriately trained, (one member of interview panel will have undertaken the training in accordance with the DfE Safer Recruitment Training).

Meet before the interviews to:

- Reach a consensus about the required standard for the job to which they will be appointing;
- Consider the issues to be explored with each candidate and who will explore then;
- Agree assessment criteria

When a candidate is known personally to a member of the selection team, it will be declared before shortlisting takes place. If necessary, changes will be made to the makeup of the selection team.

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

- The candidate's attitudes toward children and young people
- His/her ability to support the school's agenda for safeguarding and promoting the welfare of children;
- Concerns or discrepancies arising from the information provided by the candidate and/or a referee; and

- Ask the candidate if they wish to declare anything in light of the requirement for a DBS check.

The selection panel will ensure that all candidates are asked the same main questions at interview based on the list of essential criteria for the post, although supplementary questions may differ according to the candidate's answers and backgrounds.

Particular care needs to be taken to ensure that no questions or selection methods could be viewed as discriminatory. Panel members will all score questions to ensure all review each aspect reviewed by the panel. At least one panel member will record details of the answers given.

The selection will be made according to the criteria. The reasons for the unsuccessful candidates not being appointed will also be agreed so that feedback can be provided. All documentation relating to unsuccessful applicants will be securely destroyed after 6 months.

10. Conditional Offer of Appointment

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK within the last 5 years. These could include, where available:
 - For all staff, including teaching positions: criminal records checks for overseas applicants.

- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* *Management positions are most likely to include, but are not limited to, Head teachers, and Deputy Head teachers.*

Regulated activity means a person who will be:

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

11. DISQUALIFICATION UNDER THE CHILDCARE ACT 2006

- In accordance with The Childcare Act 2006 and Keeping Children Safe in Education 2023, the school needs to ensure that appropriate checks are carried out on all members of staff who manage, teach or have contact with pupils in the EYFS (Nursery and Reception) or later year provision (pre-prep up to age 8 in 'before and after-school care') to ensure that they are not disqualified under the Childcare (Disqualification) Regulations 2006.
- Early year's provision – staff who provide any care for a child up to and including reception age. This includes education in nursery and reception classes and/or any supervised activity (such as lunchtime supervision and after school care provided by the School) both during and outside of school hours for children in the early years age range
- Later years provision (for children under 8) – staff who are employed to work in childcare provided by the school outside of school hours for children who are above reception age but who have not attained the age of 8. This does not include education or supervised activity for children above reception age during school hours (including extended school hours for co-curricular learning activities, such as the school's choir or sports teams) but it does include after school provision.

All staff working within the EYFS and relevant later years provisions must provide a self-declaration to declare that they are not disqualified on any of the following grounds which include:

- Being on the DBS Children's Barred List
- Having a child in their care placed under a care order

- Being cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad
- Any offence involving death or injury to a child
- Being the subject of certain other orders relating to the care of children
- Refusal or cancellation of registration relating to childcare or children's homes or being prohibited from private fostering.
- Have been convicted of an offence overseas which would have resulted in disqualification if the offence had been committed in the UK.

12. DBS and Existing staff

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

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

13. 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.

14. Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.
- Schools with pupils aged under 8 add: 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.

15. 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.

Schools with pupils aged under 8 add: 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
- Schools with pupils aged under 8 add:
- 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

16. 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 the following checks:

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

17. Volunteers

Recruitment of volunteers will be in line with this policy and all appropriate checks will be made on volunteers as would be done for substantive, fixed term and temporary staff.

18. Casual Workers

Recruitment of Casual Workers will be in line with this policy and all appropriate checks will be made on volunteers as would be done for substantive, fixed term and temporary staff.

19. Post Appointment Induction

On-going vigilance and training is critical to establishing a robust safeguarding culture. There will be an induction programme for all newly appointed to the School, regardless of previous experience or the role taken.

20. Probationary Period

The performance of new staff will be rigorously monitored during a probationary period subject to contract, with close attention being paid to training needs and performance issues. The line manager will read and follow the School's Probation Policy and Procedure, in managing the probationary period of a new member of staff.

21. Further Advice

For further advice and guidance on managing a recruitment and selection process, please contact Head of HR or email hr@cumnor.co.uk

Related Recruitment Forms (Child Protection Suite)

- Recruitment Medical form
- Recruitment Application form
- Recruitment Reference form
- Criminal Record Self Disclosure Form

Related Child Protection Policies that are required of Schools

Please refer to the Whole School and Early Years Foundation Stage policies on:

- Safeguarding and Child Protection Policy and Procedures
- Induction of New Staff, Governors and Volunteers in Child Protection
- Interaction with Pupils: Code of Conduct for Staff
- Policy for Procedures on Managing Concerns and Allegations Against Staff (including the Headmaster, DSLs and volunteers)
- Policy for Pupils on Confidentiality
- Policy on Adults staying in Boarding Houses
- Use of ICT, Mobile Phones and Other Electronic Devices
- Taking, Storing and Using Images of Children
- Whistleblowing Policy
- Reasonable Restraint Policy
- Welfare Policy
- Missing Child Policy
- Social Media Policy
- Sexting Policy
- Relationships & Sex Education Policy
- Employment of Ex-Offenders Policy
- Staff Handbook

All the above policies together form the “suite” of Child Protection policies that the Regulations require. In accordance with those Regulations, all of them should be available to parents on the school’s web site and reviewed annually by Governors.

References

- Working Together to Safeguard Children DfE 2024
- Keeping Children Safe in Education DfE September 2024
- Disqualification under the Childcare Act 2006
- ISI Regulatory Requirements

Appendix 1

Criminal Record Self Disclosure Form

Part 1		
Name	Position	
<p>Please circle either Yes or No for each question on this form. When responding please disclose information relating to offences in the UK but also any equivalent offence overseas. If you circle Yes to any question then please provide the following information in writing:</p> <p>1 details of the order, restriction, conviction or caution and the date that this was made;</p> <p>2 the relevant court or body and the sentence, if any, which was imposed; and</p> <p>3 provide a copy of the relevant order or conviction.</p>		
Offences		
To the best of your knowledge have you:		
Ever been barred from working with children.	Yes	No
Been convicted of a violent offence against an adult.	Yes	No
From 6 April 2007 been cautioned, subject to a court order, bound over, received a reprimand or warning for a violent offence against an adult.	Yes	No
Been convicted of a sexual offence against an adult.	Yes	No
From 6 April 2007 been cautioned, subject to a court order, bound over, received a reprimand or warning for a sexual offence against an adult.	Yes	No
Been convicted of a violent offence against a child.	Yes	No
From 6 April 2007 been cautioned, subject to a court order, bound over, received a reprimand or warning for a violent offence against a child.	Yes	No
Been convicted of a sexual offence against a child.	Yes	No
From 6 April 2007 been cautioned, subject to a court order, bound over, received a reprimand or warning for a sexual offence against a child.	Yes	No
Orders relating to the care of children		
Has an order ever been made for a child in your care to be taken into the care of a local authority or to be placed under the supervision of a local authority?	Yes	No

Have your children ever been the subject of a child protection order?	Yes	No
Have you ever been refused an application for registration of a children's home or had any such registration cancelled?	Yes	No
Have you ever been refused registration for the provision of childcare (including nurseries, day care and child minding or other childcare), been disqualified from any such registration or had that registration cancelled?	Yes	No
Have you ever been prohibited, restricted or disqualified from private fostering?	Yes	No

Part 2	
Declaration	
<p>I confirm that I have completed this form to the best of my knowledge and that I have not knowingly withheld any relevant information. I understand that a failure to disclose relevant information now, or the provision of false information, may result in the termination of my employment or the withdrawal of an offer of employment. I understand that knowingly working in early or later years provision whilst disqualified is a criminal offence.</p> <p>I agree to disclose to the School any change in my circumstances which may result in my being disqualified from working in early or later years provision.</p>	
Signed
Dated
Position