

Recruitment, Selection & Disclosure Policy

BETHANY SCHOOL
CURTISDEN GREEN
GOUDHURST
KENT

Why the pupils think Bethany needs a recruitment, selection & disclosure policy.

The school takes care when appointing staff because it wants to make sure that the staff are the right ones to teach us.

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Contents

1. Introduction	3
2. Recruitment & Selection Procedure.....	3
3. Medical Fitness	6
4. Pre-Employment checks	7
5. Contractors, Agency Staff and employees of third-parties (other than supply agencies)	12
6. Volunteers	13
7. Visiting speakers and Prevent Duty	13
8. Policy on recruitment of ex-offenders	15
9. Retention of Records.....	17
10. Referrals to the DBS and National College for Teaching Regulation Agency (TRA).....	17
11. Queries	18
12. Shared responsibility	18
13. Suitability of other adult’s resident on site	18

1. Introduction

Bethany School ("the School") is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff. 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 aims of the School's recruitment policy are as follows:-

- To ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- To ensure that all job applicants are considered equitably and consistently;
- To ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital status, disability or age;
- To ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Safeguarding children and safer recruitment in education(SCSRE), Keeping Children Safe in Education - September 2018(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); and
- To ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks;
- To fully comply with the requirements of Standard 14 of the National Minimum Boarding Standards;

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

2. Recruitment & Selection Procedure

All applicants for employment, including ancillary staff, sessional staff, peripatetic staff and volunteers who have regular/frequent contact with pupils will be required to complete an **Application Form** containing questions about their academic and employment history, and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed.

Should there be any gaps in academic or employment history, a satisfactory explanation must be provided. A Curriculum Vitae will not normally be accepted in place of the completed Application Form.

Applicants will receive a job description and person specification for the role applied for.

The applicant will then be invited to attend a **Formal Interview** at which his/her relevant skills and experience will be discussed in more detail. A written record will be kept of the interview. At least one member of the Bethany Staff who has successfully completed DfE accredited Safer Recruitment training will be involved in the interview process. Currently, the trained staff are:

Francie Healy – Headmaster
Stuart Harris - Bursar
Steve Winter – Deputy Head
Alan Sturrock –Pastoral Deputy
Toni Carter – Human Resources Manager
Roger Stubbs – Chairman of Governors
Wendy Kent - Governor

If it is decided to make an offer of employment following the **formal interview**, 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 (where that has not previously been verified);
- The receipt of two references (one of which must be from the applicant's most recent employer) which the School considers to be satisfactory;
- For teaching positions, confirmation from the National College for Teaching and Leadership that the applicant is not subject to a prohibition order;
- Where the position amounts to 'regulated activity' (see section 4.3 below, page 11) the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an on-line update check through the DBS Update Service;
- Where the position amounts to 'regulated activity' (see section 4.3 below, page 11) confirmation that the applicant is not named on the Children's Barred List;
- Confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies or restricts them from providing education at a school, taking part in the management of an independent school or working in a position which involves regular contact with children;
- Confirmation that the applicant is not 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;

- Verification of the applicant's medical and mental fitness for the role (see section 3 below); and
- Verification of the applicant's right to work in the UK;
- Any further checks which are necessary as a result of the applicant having lived or worked outside of the UK, to be assessed and reviewed by Headmaster with the support of Home Office Guidance on Criminal Records checks for overseas applicants; and
- Confirmation that the applicant is not subject to a sanction or restriction under the EEA professional regulating authority;
- Verification of professional qualifications which the School deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).
- For volunteers, no concerns are raised by others in the School community.

The School is not permitted to check the Children's Barred List unless an individual will be engaging in 'regulated activity'. 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.

DBS checks can sometimes take a number of weeks to be completed. Sometimes, due to exceptional circumstances, a person may need to start at Bethany School as an employee or volunteer before the check is completed. As long as the person concerned does not count as a member of Boarding Staff by ISI definitions, then they may be permitted to start provided that the following conditions have been met:

- The DBS check is already being processed;
- Satisfactory Children's Barred List clearance has been secured;
- All of the other checks above have been completed;
- A risk assessment undertaken by the line manager and signed off by the Headmaster agrees and confirms appropriate safeguards have been implemented (for example: loose supervision);
- Safeguards and risk assessment reviewed at least every two weeks;
- The person in question is informed what these safeguards are;
- A note is added to the single central registrar and evidence kept of the measures put in place.

Appointment of 'gap' student staff includes every element of the above recruitment checking system that is possible (even if the student concerned is already known to the school or to a trusted school abroad or is recruited through an agency).

Where 'gap' student staff are recruited from abroad, the school obtains a 'certificate of good conduct' or equivalent from the relevant authorities of the student's home country where such facilities are available. A DBS check will be initiated as soon as is practically possible upon their arrival in this country.

If it is decided to make an **Offer of Employment** following the formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date;
- the receipt of two satisfactory references (one of which must be from the applicant's most recent employer);
- the receipt of a Disclosure from the DBS with which the School is satisfied;
- Completion of a confidential medical questionnaire. Should the questionnaire raise any concerns, a letter from the applicant's GP confirming his/her fitness for the job will be requested.

If the offer is accepted and the above conditions are satisfied, the applicant will be issued with a **Contract of Employment** as confirmation of employment. For those whose offer of employment predates their commencement date by more than 3 months the DBS check will be carried out, and the Contract of Employment issued, within 3 months prior to the date of commencement.

3. Medical Fitness

The School is legally required to verify the medical and mental 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.

Successful applicants will be required to sign a declaration of medical and mental fitness confirming that there are no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the role. If an applicant prefers to discuss this with the School instead, or to attend an occupational health assessment to consider their fitness for the role, they should contact the Human Resources Manager so that appropriate arrangements can be made.

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

4. Pre-Employment checks

In accordance with the recommendations set out in, KCSIE 2018, DUCA and the requirements of the Education (Independent School Standards) Regulations 2014 and the Boarding Schools National Minimum Standards the School carries out a number of pre-employment checks in respect of all prospective employees.

4.1 Verification of Identity and Address

All applicants who are invited to interview will be required to bring the following evidence of identity, right to work in the UK, address and qualifications: as set out below and in the list of valid identity documents at Appendix 1 (these requirements comply with DBS identity checking guidelines): -

4.1.2 From the UK or the European Economic Area

Route 1

You must be able to show:

- one document from Group 1
- 2 further documents from either Group 1, or Group 2a or 2b

At least one of the documents must show your current address.

If you're not a national of the UK or the EEA and you're applying for voluntary work you may need to be fingerprinted if you can't show these documents.

Route 2

If you don't have any of the documents in Group 1, then you must be able to show:

- one document from Group 2a
- 2 further documents from either Group 2a or 2b

At least one of the documents must show your current address. The organisation conducting their ID check must then also use an appropriate external ID validation service to check the application.

If you're an EEA national who's been resident in the UK for 5 years or less you may need to be fingerprinted if you can't show these documents.

Route 3

Route 3 can only be used if it's impossible to process the application through Routes 1 or 2. EEA nationals who've been resident in the UK for 5 years or less can't use Route 3.

For Route 3, you must be able to show:

- a birth certificate issued after the time of birth (UK and Channel Islands)
- one document from Group 2a
- 3 further documents from Group 2a or 2b

Where an applicant claims to have changed his/her name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) he/she will be required to provide documentary evidence of the change.

The School asks for the date of birth of all applicants (and proof of this). Proof of date of birth is necessary so that the School may verify the identity of, and check for any unexplained discrepancies in the employment and education history of all applicants. The School does not discriminate on the grounds of age.

4.2 References

References will be taken up on short listed candidates prior to interview. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

All offers of employment will be subject to the receipt of a minimum of two satisfactory written references, one of which 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 referee should be from the employer with whom the applicant most recently worked with children. Neither 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. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism" (see the definition of "extremism" at Section 8 below). All referees will be sent a copy of the job description and person specification 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 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 false, unsubstantiated 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 issues were deemed to have resulted from allegations which were found to be false, unsubstantiated or malicious;
- whether the applicant could be considered to be involved in "extremism" (see the definition of extremism" at section 7 below).
- Once a conditional offer of employment has been made the current employer will be contacted again to ascertain details of the applicant's sickness record, should any concerns have been raised on the Health Declaration form.

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 before any appointment is confirmed.

4.3 Disclosure and Barring Check

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. Since 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 DBS and the Home office have developed a set of filtering rules relating to spent convictions which work as follows:

For those aged 18 or over at the time of the offence

An adult conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:

- Eleven years have elapsed since the date of conviction;
- It is the person's only offence; and
- It did not result in a custodial sentence.

It will not be removed under any circumstances if it appears on a list of ‘specified offences’ which must always be disclosed. If a person has more than one offence on their criminal record, then details of all their convictions will always be included.

A caution received when a person was aged 18 or over for an offence committed in the United Kingdom will not be disclosed if six years have elapsed since the date it was issued, and if it does not appear on the list of ‘specified offences’.

For those aged under 18 at the time of an offence

A conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:

Five and a half years have elapsed since the date of conviction; and
It is the person’s only offence; and
It did not result in a custodial sentence.

Again, the conviction will not be removed under any circumstances if it appears on the list of ‘specified offences’. Or if a person has more than one offence on their criminal record. A caution received when a person was aged under 18 for an offence committed in the United Kingdom will not be disclosed if two years have elapsed since the date it was issued, and if it does not appear on the list of ‘specified offences’.

The list of ‘specified offences’ which must always be disclosed

This contains a large number of offences, which includes certain sexual, violent and other offences that are considered so serious they will always be disclosed, regardless of when they took place or of the person’s previous or subsequent criminal record. 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 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 (whether paid or unpaid), will amount to ‘regulated activity’ if it is carried out;

On an unsupervised basis:

Frequently, meaning once a week or more; or
Overnight, meaning between 2.00am and 6.00am; or
Satisfies the ‘period condition’, meaning four times or more in a 30 day period; and
Provides the opportunity for contact with children.

It is for the School to decide whether a role amounts to ‘regulated activity’ taking into account all the relevant circumstances. However nearly all posts at the School amount to regulated activity. It is the School’s policy to carry out both an enhanced DBS check and a check of the Children’s Barred List on all applicants who are appointed to work in regulated activity. Limited exceptions could include an administrative post undertaken on a temporary basis in the school office outside of term time.

The DBS now issues a 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. Original certificates should not be sent by post, applicants must bring the original certificate into the School within two weeks of it being received. A convenient time and date for doing so should be arranged with the Human Resources Manager as soon as the certificate has been received. Applicants who are unable to attend at the School to provide the certificate are required to send in a certified copy by post or email within two weeks of the original disclosure certificate being received. Certified copies must be sent to the Human Resources Manager. Where a certified copy is sent, the original disclosure certificate must still be provided on the first working day. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School.

If there is a delay in receiving a DBS disclosure the Head has discretion to allow an individual to begin work pending receipt of disclosure. This will only be allowed if all other checks, including a clear check of the Children’s Barred List (where the position amounts to regulated activity), have been completed and once a risk assessment and appropriate supervision has been put in place.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants may also be asked to provide further information, including a criminal records check from the relevant jurisdiction(s).

5. Contractors, Agency Staff and employees of third-parties (other than supply agencies)

Each employer engaged by the School is responsible and must complete the same checks for their employees that the School is required to complete for its staff. The School requires confirmation in writing that these checks have been completed before employees of the Contractor 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 School will independently verify the identity of staff supplied by contractors or an agency in accordance with section 4.1 above and will request (as is best practice) the provision of the original DBS disclosure certificate before the contractor or agency staff can commence work at the School.

Temporary agency support workers which can include but is not limited to catering staff and/or taxi drivers, bus drivers, ISI staff, Young enterprise external staff, independent listeners, activity providers etc., will be required to have a letter from their employer confirming that all necessary vetting checks have taken place. They must also provide the enhanced DBS numbers and dates for such staff and if any adverse record is shown on the DBS, the School must be informed and the Headmaster must make the final decision on whether or not that individual may offer his/her services to the School. These staff will also have their identity independently verified by the School upon their initial arrival on the School premises. All bus and taxi companies will be requested to ensure that all drivers wear photo ID cards while on duty with the School.

All agencies working under contract to the School will be made aware of their responsibilities to keep the School informed of any staff changes at the start of the contract and annually thereafter. The School will carry out regular checks on agency and contractors' personnel to ensure that information is up to date and compliant.

Builders and tradesmen employed to work at the School will be signed in at reception and will be accompanied to their place of work. Builders and Tradesmen who visit the School on a regular basis will be required to obtain DBS checks for their staff and the School will provide assistance and guidance where necessary. The sites of large building projects will be fenced with individual access and totally separated from the School campus. The employing contractor / site supervisor will be given a safeguarding brief at the start of the contract, during which they will be made aware of the School Safeguarding Policy and their responsibilities towards the pupils. The School will check regularly that such safeguards are

being observed – for example self-certification of regular site staff, monitoring of visitors to site and no trespass out of the site compound.

6. Volunteers

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 4.3 above will apply to all volunteers).

The School will request an enhanced DBS disclosure without Children’s Barred List information on all volunteers who do not undertake regulated activity. This is likely to be because their volunteering duties are subject to regular, day to day supervision by a fully checked member of staff or by a volunteer who the School has deemed appropriate to supervise and ensure the safety of those pupils in their care.

Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils.

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.

In addition the School will 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;
- Qualifications, if relevant, to the volunteering role and
- An informal safer recruitment interview.

7. Visiting speakers and 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 is not permitted to obtain a DBS disclosure or Children’s barred List information on any visiting speaker who does not engage in regulated activity at the School or perform any other regular duties for or on behalf of the School.

All visiting speakers will be subject to the School's usual visitor's protocol. This will include proof of identification on arrival to the School Office, signing in and out at Reception, the wearing of a visitor's badge at all times and being escorted by a fully vetted member of staff between appointments. The line manager or staff member who has organised the visitor must also complete a Visiting Speaker form which will be kept by Human Resources.

The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School, in doing so the School will always have regard to the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

"Extremism" is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations."

In fulfilling its Prevent Duty obligations the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

7.1 Visitors who are not pupils of the school

Between 8am and 5.30pm Monday to Friday all visitors to the school **MUST** report to reception to be signed into school and be given a visitor's badge and escorted at all times.

Visitors to a boarding house outside 8am and 5.30pm **MUST** immediately report to the member of staff on duty within the boarding house so that they are aware of them visiting. Duty staff will then supervise the visit and will deem where it is appropriate for the visitor to be. For example, if other boarders are in the room and have gone to bed or may be changing, it is not appropriate for a visitor, even a parent, to be in the room.

7.1.2 Visitors of Staff

Regular visitors to staff in boarding houses or in onsite accommodation who attend more than once a week or 4 times a month during term time are required to undertake an Enhanced DBS check.

Any visitor wanting to stay overnight during term time in a boarding house or in onsite accommodation will require an Enhanced DBS check.

Visitors in staff accommodation must not enter the boarding area of the house unless they are known to the school and are suitably vetted. It is the responsibility of the member of staff to ensure their visitors are aware of the importance of not engaging with pupils of the

school. Staff must not host boarders in their accommodation while they have visitors without good cause to do so.

8. Policy on recruitment of ex-offenders

8.1 Background

The School will not unfairly discriminate against any applicant 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 applicant has a criminal record this will not automatically bar him/or her from employment within the School. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph 8.2 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'. However, 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 DBS filtering rules (see section 4.3 above).

A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure 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 disqualified from working with children to attempt to apply for a position within the School. The School will make a report to the Police and/or the DBS if;

- It receives an application from a barred person;
- 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.

8.2 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 through a Risk Assessment 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 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 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, 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 within the last 10 years.

8.3 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 Head of the School before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, he/she can do so by contacting the DBS direct. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the School will, where practicable, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the Disclosure information.

8.4 Retention and Security of Disclosure Information

The School's policy is to observe the guidance issued or supported by the DBS on the use of Disclosure information, but it is under no obligation to do so.

In particular, the School will: -

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of the School's senior management team;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of 6 months. The School will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken;
- ensure that any disclosure information is destroyed by suitably secure means such as shredding;
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

9. Retention of Records

The School is legally required to undertake the above pre-appointment checks. Therefore, if an applicant is successful in their application, the School will retain on his/her personal file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help the School to discharge its obligations as an employer e.g. so that the School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by the School for the duration of the successful applicant's employment with the School.

If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after 6 months. The same policy applies to any suitability information obtained about volunteers involved with School activities.

10. Referrals to the DBS and National College for Teaching Regulation Agency (TRA)

This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks the School also has a legal duty to make a referral to the DBS in circumstances where an individual:-

- Has applied for a position at the School despite being barred from working with children; or

- 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.

If the individual referred to the DBS is a teacher, the School will make a referral to the TRA, LADO and Charity Commission.

11. Queries

If an applicant has any queries on how to complete the application form or any other matter he/she should contact the Bursar.

12. Shared responsibility

All staff have a responsibility to ensure that those who come to Bethany as employees or volunteers are recruited according to the above policy. Staff and volunteers are recruited in many aspects of school life and make initial contact through many members of staff. Therefore, all staff, both teaching and non-teaching, will be reminded, at the start of each term in staff meetings, of their shared responsibility, of the need to ensure that if they wish to bring anyone onto site for employment or as a volunteer they must first contact the Human Resources Manager to gain advice and to set the recruitment process properly in motion. It will also be made clear that failure to follow this procedure represents a serious offence which is likely to have major disciplinary consequences for the member of staff who breached these conditions.

In addition, staff who regularly wish to recruit employees or volunteers in their areas of work (most specifically PE/Games, Activities, Music and Drama) will have their responsibilities specifically written into their job descriptions.

13. Suitability of other adult's resident on site

The school undertakes DBS checks on all adults resident in onsite accommodation including children over 16 who are not pupils of school, this includes children over 16 of staff living in boarding accommodation including those away at university. These checks are recorded on the single central register. All extended family members visiting staff living in boarding accommodation will be treated as visitors, those who are likely to stay regularly, i.e. weekly, must undergo a DBS check. The school will expect such family members who are resident onsite to sign an appropriate agreement which adheres to the school's expectations of people living on site.

Appendix 1

DISCLOSURE & BARRING SERVICE - LIST OF VALID IDENTITY DOCUMENTS

Group 1

Document	Notes
Passport	Any current and valid passport
Biometric residence permit	UK
Current driving licence photocard - (full or provisional)	UK, Isle of Man, Channel Islands and EEA
Birth certificate - issued within 12 months of birth	UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, for example embassies, High Commissions and HM Forces
Adoption certificate	UK and Channel Islands

Group 2a

Document	Notes
Current driving licence photocard - (full or provisional)	All countries outside the EEA (excluding Isle of Man and Channel Islands)
Current driving licence (full or provisional) - paper version (if issued before 1998)	UK, Isle of Man, Channel Islands and EEA
Birth certificate - issued after time of birth	UK, Isle of Man and Channel Islands
Marriage or civil partnership certificate	UK and Channel Islands
Immigration document, visa or work permit	All countries outside the EEA - valid only if you're working in the country that issued the document
HM Forces ID card	UK
Firearms licence	UK, Channel Islands and Isle of Man

All driving licences must be valid.

Group 2b

Document	Notes	Issue date and validity
Mortgage statement	UK or EEA	Issued in last 12 months
Bank or building society statement	UK and Channel Islands or EEA	Issued in last 3 months
Bank or building society statement	Countries outside the EEA	Issued in last 3 months - branch must be in the country where the you live and work
Bank or building society account opening confirmation letter	UK	Issued in last 3 months
Credit card statement	UK or EEA	Issued in last 3 months
Financial statement, for example pension or endowment	UK	Issued in last 12 months
P45 or P60 statement	UK and Channel Islands	Issued in last 12 months
Council Tax statement	UK and Channel Islands	Issued in last 12 months
Letter of sponsorship from future employment provider	Non-UK or non-EEA only	Must still be valid - valid only if you're residing outside of the UK at time of application

Document	Notes	Issue date and validity
Utility bill	UK - not mobile telephone bill	Issued in last 3 months
Benefit statement, for example Child Benefit, Pension	UK	Issued in last 3 months
Central or local government, government agency, or local council document giving entitlement, for example from the Department for Work and Pensions, the Employment Service, HMRC	UK and Channel Islands	Issued in last 3 months
EU National ID card	-	Must still be valid
Cards carrying the PASS accreditation logo	UK, Isle of Man and Channel Islands	Must still be valid