

## Safer Recruitment

**BPS adhere to the temporary guidance as recommended by ISI:**

**ISI Guidance 405**

**COVID-19** – Vetting requirements have not changed during the pandemic and remain an extremely important step to ensure that unsuitable people are not allowed to access pupils. However, inspectors should be sensitive to the practical difficulties which schools have faced in carrying out recruitment checks during this period.

**ISI Guidance 406**

Temporary changes have been made by the DBS to ID checking guidelines and by the government to processes for checking Right to Work to limit the need for face-to-face contact. These allow that checks can be initiated on the basis of scanned images and live video links for urgent cases where it is not possible to follow normal guidelines. Where this concession is relied on, original documents must be viewed when the individual first attends in person. Where used, schools should record both dates to keep an audit trail. We suggest the first date is entered on the register and the second in the notes column or on the individual's file, signposted from the SCR. Inspectors can allow leeway for reasonable pragmatic solutions which show a conscientious approach to compliance.

**ISI Guidance 407**

Many schools have contacted ISI with questions about whether or how far they are required to repeat vetting checks for staff following the lockdown period. See note 421 below for the three definitions of 'staff'. In short, where employees have continuity of employment, there is no requirement for checking them again when schools re-open, even if those staff have not been deployed during the period of closure. In respect of other categories of 'staff', such as regular self-employed people, when schools re-open, they should take risk-based decisions about whether they are making re-appointments or whether the previous arrangements have been extant throughout. *Remote catch up meetings are arranged within a three month period to ensure checks remain current. These are noted and held on file.*

### Policy

Banstead Prep School aims to maximise every pupil's potential and recognises the importance of recruiting the best possible staff who share in this aim. It therefore ensures that safer recruitment is practised in vetting the suitability of staff and volunteers to work with pupils. Banstead Prep School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The school will:

- Ensure that the best possible staff are recruited on their merits, abilities and suitability to work with children and young people
- Ensure that no job applicant is treated unfairly. Banstead Prep School is committed to ensuring that the application of the Safer Recruitment Policy (or whatever) is non-discriminatory in line with the UK Equality Act (2010). Further details may be found in the school's Equal Opportunities Policy.
- Ensure a sharp focus on suitability for working in Banstead Prep School and being involved with children following the recommendations and guidance including the recommendations of the Department for Education and Skills (DCSF) in 'Keeping Children Safe in Education (DfE Sep 2019)' and the code of practice published by the Disclosure and Barring Service.
- Recognise that it is illegal, in accordance with section 3(2) of the Safeguarding Vulnerable Groups Act 2006, for anyone who is barred from regulated activity relating to children to carry out work or intend to carry out work at the school in contravention of any direction made under section 142 of the 2002 Act or any disqualification,

prohibition or restriction which takes effect as if contained in such a direction. This also applies to the proprietor of the school (UCST) and members of its Board.

- Ensure all necessary pre-employment checks are made concerning suitability of staff, Local Governing Body and volunteers.
- Ensure that The Single Central Record and employees' individual files are kept up to date by the HR Manager (Faye Landreth) to record the checks made. The SCR is reviewed by the Headteacher, Safeguarding Governor and relevant Senior Leadership Team at the termly Safeguarding meetings.
- The school will ensure that it keeps up to date with legislation and will develop procedures to comply with any new guidelines.

To achieve these aims all staff involved in recruitment and selection have a clear understanding of the requirements of this policy. The HR Manager is responsible for ensuring that staff are complying with the Safer Recruitment Policy.

This policy applies to all parts of the school, including the EYFS setting. Banstead Prep School seeks to implement this policy through adherence to the procedures set out in the rest of this document.

This document is available to all interested parties, including parents and parents of prospective pupils, on the school's website and on request from the School Office. It should be read in conjunction with the following documents:

- United Learning letter on guidance for staff-student relationships
- Child Protection Policy
- Equal Opportunities Policy

This document is reviewed annually by the Local Governing Body, or as events or legislation change requires. The next scheduled date for review is November 2020.

### **Recruitment and Appointments Procedure**

To ensure vigorous selection and vetting of all staff the following recruitment and appointments procedure is followed:

#### Recruitment Procedure: Application

- A United Learning application form, confidential disclosure form and applicant monitoring form is completed and returned to the HR Manager. In exceptional circumstances or where an agency is used in the recruitment a CV may be accepted. However, the confidential disclosure form and applicant monitoring form will be completed by the successful applicant.
- Applicants are short-listed by SLT (Senior Leadership Team) and the relevant Head of Department or Manager and invited to interview.
- At this stage, the HR Manager checks for any gaps in the short-listed applicants' employment or education history. If these need to be followed up at interview, she alerts the interview team.

#### Interview Process

- A panel interview will take place to assess the applicant's suitability. Each recruitment panel has one member trained in safer recruitment.
- A written record of interview process and its outcome is kept by the HR Manager.
- In the case of volunteers, the school will conduct an informal interview and ensure that the school receives no contrary indications from anyone in the school. The Head of Sport is responsible for meeting and informally interviewing any peripatetic sports coaches. If they are unavailable, one of the Deputy Heads must stand in for them. The



Head of Music meets peripatetic staff who are going to be working in the School. A member of SLT meets any peripatetic extra-curricular club provider (other than sports coaches and Music Peripatetic staff).

#### Appointment Procedure: Pre-Employment Checks

Banstead Prep School makes the following checks on all new members of staff before the start of their employment. The term 'staff' in this procedure applies to all staff including:

- Teaching
- Peripatetic staff
- Sports coaches
- Staff from overseas
- Non-teaching/support staff
- Supply and agency staff
- Voluntary staff (including parents who accompany staff on trips involving overnight stays)
- Pupils employed by the school in an official capacity

These checks are carried out and each is recorded by the HR Manager (Faye Landreth) on the electronic Single Central Record which is also maintained by the HR Manager. The HR Manager, School Business Manager and the Headteacher only have access to the SCR. All offers of employment are conditional on the checks listed below, including enhanced DBS checks and satisfactory references and this is made clear to the applicant in their offer letter.

On the rare occasions that Banstead Prep School uses supply agencies, the HR Manager obtains the evidence that all checks have been carried out by the supply agency and obtains a copy of the DBS certificate (which is disposed of within 6 months). The Front Office or HR Manager checks the teacher's/person's identity before they start work and takes copies for the file. These are signed and dated to show they have been verified.

#### **Identity**

All applicants must confirm their identity (name and date of birth) against:

- Their passport or driving licence which must include their photograph
- If an applicant claims to have changed their name, they will be required to provide documentary evidence to support their claim.

The above details are recorded on the Single Central Record by the HR Manager (Faye Landreth), including the post to which the applicant has been appointed and also the date of appointment. The identity of the person checking the above details is also recorded on the SCR along with the date on which the identity was checked.

#### **Medical Fitness**

Depending on the post, prior to starting at BPS, new staff must complete a medical questionnaire by an independent job screening company (Medigold), or sign a declaration that states that the applicant knows no reason, on the grounds of physical or mental health why they should not be able to discharge the responsibilities in post. Both types of declarations of medical fitness are recorded on the Single Central Record, along with the name of the person verifying and the date on which the check took place. Our medical questionnaires are written in line with the requirements of the UK Equality Act (2010) and therefore only ask questions which are relevant to the job the appointee has been offered. In accordance with EYFS regulations, staff in our EYFS setting are also required to seek medical advice when taking medication to ensure that it does not inhibit their ability to look after pupils in our EYFS setting.

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### **Right to work in the UK**

- Checks will be made after a job offer has been accepted to ensure the applicant has permission to work in the UK if they are not a UK national and this will be a condition of their appointment.
- These details are recorded on the Single Central Record and the verifier's name recorded with the date of the check.

Relevant notes from these checks will be recorded on the Single Central Record.

### **Previous employment history**

- Employment history is checked on the application form. Any gaps in employment which do not have clear reasons are raised at interview. The applicant will be notified that any previous employer may be contacted by the school.

### **Gaps in Employment (to be completed for new starters from 1<sup>st</sup> May 2019)**

Checks of previous employment history should ascertain satisfactory reasons for any gaps in employment. The information provided by the candidate on their application form should be reviewed and checked against references subsequently received, and any discrepancies taken up with the candidate. Interview records should capture details of any gaps in employment. This information will be recorded on the SCR. This check is only applicable to the 'employee' section of the SCR.

### **Character and Professional References**

- The school only accepts references obtained directly from the referee and will not accept testimonials provided by the applicant or open references.
- The school will compare all references with the information on the application form and any discrepancies will be taken up with the applicant.
- All offers of employment will be subject to the receipt of a minimum of 2 satisfactory references, one of which must be from the applicant's current or most recent employer.
- References should be from a senior person with appropriate authority to fully complete the reference questionnaire, including the questions specifically relating to safeguarding.
- If the current/most recent employment does not involve work with children, then the 2<sup>nd</sup> referee should be from the employer with whom the applicant most recently worked with children.
- If the applicant is not currently working in a school, the HR Manager will make contact with the school at which the applicant last worked in order to confirm employment details and reasons for leaving.
- All referees will be sent a copy of the job description and asked
  - If they believe the applicant is suitable for the job for which they have applied
  - If they have any reason to believe that the applicant is unsuitable for work with children
- Referees of current/previous employment will be asked in addition:
  - To confirm the applicant's dates of employment, salary, job title, reason for leaving, performance and disciplinary record.
  - If the applicant has ever been involved in disciplinary procedures involving issues relating to the safety and welfare of children. These must include anywhere disciplinary action has expired.
  - If any allegation 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.
- If references are taken over the telephone, detailed notes are taken and are signed by her and filed in the personnel file.

- The HR Manager verifies written references via telephone once received to give the referee an opportunity to add further information verbally.

The identity of the person checking the above details is also recorded on the Single Central Record along with the date in which the identity was checked.

### **Qualifications**

- All applicants offered a position will be informed it is conditional on them confirming educational and professional qualifications referred to in their application and considered necessary by the school. Original certificates must be shown to the HR Manager or Head's PA who will take a copy for the person's individual file. In cases where the Head's PA checks the documentations, signed and dated copies of qualifications are returned to the HR Manager. The qualifications are recorded on the Single Central Record (N/A is entered if not appropriate) and the verifier's name recorded with the date of the check.

### **Enhanced DBS check**

An enhanced DBS check is applied for by the HR Manager in respect of all new staff. Requirements for supply staff are made in the section below labelled 'outside agencies'.

- The enhanced DBS check is made as soon as practical after an appointment has been made, but in accordance with the 3-month rule. Enhanced DBS checks will not normally be obtained more than 3 months before the start date of employment, so with teaching or other staff appointed a number of months before their start date, the HR Manager does not make the application until about 4 months before they start work at Banstead Prep School.
- The HR Manager will pursue enhanced DBS check applications which threaten not to be returned before a start date and will monitor this closely. If, in occasional circumstances, the disclosure has not arrived before the start date of employment, a check must be made against Barred List and an internal risk assessment will be carried out by the HR Manager and signed by the Headteacher. The school recognises that it is *illegal* for anyone to work in a school without first being checked against Barred List. The person who is the subject of the risk assessment must sign a copy to acknowledge that they are aware of any restrictions or monitoring. A note is entered on the SCR that the risk assessment has been carried out. When the enhanced DBS check is received and does not raise any matters of concern, the Headteacher or HR Manager will inform the member of staff that they are no longer subject to any restrictions of the risk assessment. No staff member/Peripatetic is left unsupervised with children until their full DBS has been received.
- The applicant will be asked to complete the application for a DBS disclosure online. Once the HR Manager has seen the supporting identification documents, the employer section of the DBS application will be completed and the online form submitted. The HR Manager co-ordinates enhanced DBS checks.
- Any information contained in a disclosure is confidential to the applicant and United Learning; the school is aware that any unauthorised disclosure is a criminal offence under the Police Act 1997 and therefore information will not be disclosed to unauthorised persons. The school's copy is kept secured in a folder in the HR Manager's locked filing cabinet. From 17 June 2013 disclosures are no longer supplied to the school as the employer, only to the applicant. Banstead Prep School receives notification from the DBS confirming the certificate reference number and whether the certificate contains any information. Only if information is contained will Banstead Prep School request sight of the applicant's original disclosure certificate. Any DBS check information obtained for applicants who are not appointed is kept securely and then shredded after 6 months.

- The identity of the person checking the enhanced DBS check and the date which the check took place is recorded on the Single Central Record. The enhanced DBS check number and the type (enhanced) are also recorded on the SCR. A copy of the SCR is saved monthly to our system by the HR Manager and can be accessed remotely by the Headteacher and Business Manager (and HR Manager).
- All staff recruited before May 2002 have had enhanced DBS checks, even though this is not strictly required by law, and this has been recorded on the SCR. Banstead Prep School does not have a policy of renewing enhanced DBS checks unless it feels that there is good reason to do so. However, were the school to carry out more than one enhanced DBS check on a member of staff, a record of the date and reference number of the original enhanced DBS check would be retained in the notes section in the enhanced DBS section of the SCR. This would be to show that the necessary checks had been carried out at the time of first employment.

The following people do not require enhanced DBS checks:

- Visitors to the school who have no unsupervised contact with children or brief contact in the presence of a teacher or who visit the site when pupils are not present
- Visitors carrying out repairs or servicing equipment or building/contractors who do not have contact with children
- Volunteers or parents who only accompany staff at specific school events or on one-off day trips and volunteers who are not in regulated activity (ie. supervised and not carrying out personal care duties)
- Existing volunteers continuing with their old duties unless they give cause for concern or have unsupervised contact with children or accompany a school party on an overnight stay
- Secondary school pupils on work experience or students aged 18 or over in normal student capacity

The school would report promptly to the DBS (via the DLS) any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child.

### **Overseas checks**

- Any staff recruited from overseas since 2002 are subject to the following checks and employment is conditional on these being met. Such checks apply to any UK nationals returning to the UK to work at Banstead Prep School after working in a foreign country. The HR Manager will consult the DBS website [www.homeoffice.gov.uk/dbs](http://www.homeoffice.gov.uk/dbs) to ascertain what evidence is available from the country in question
  - An enhanced DBS check from the applicant country of origin
  - A certificate of good conduct from the country of origin
  - Extra references will be requested only where the other country will not provide a certificate of good conduct, and such further checks will be made as the Headteacher considers appropriate, with regards to any guidance issued by the Secretary of State.

The school requests that staff recruited obtain overseas checks if they have lived or worked abroad for a period of six months or more over the age of 16, unless it deems that there are no grounds to do so and in which case the member of staff must not have lived or worked abroad in the last ten years.

### **EEA checks**

As of 1st January 2021, professional regulators in the EEA (EU, Iceland, Liechtenstein and Norway) no longer share information about sanctions imposed on EEA teachers with the Teaching Regulation Agency (TRA).

New staff will be asked to provide proof of their past conduct - a letter of professional standing issued by the professional regulating authority in the country in which they worked/overseas check equivalent to our DBS. Such evidence will be considered alongside other information obtained through other pre-appointment checks to help assess their suitability. The same checks will be carried out as for standard overseas checks above.

Any enquiries made and responses received are recorded on the school's SCR. Where evidence is not available, it will be demonstrated and evidenced that reasonable attempts were made.

#### **Barred List/Protection of Children Act List (PoCA)**

- It is illegal to employ anyone or use a volunteer in a regulated activity who is barred from working with children.
- All adults working in the school will be cleared through Barred List by the HR Manager. No one will be allowed to work in any capacity in the school who has not first been checked and cleared to work with children through Barred List.

#### **Prohibition Orders**

From September 2014 checks must also be carried out on all teaching staff to ensure that they are not subject to a current Prohibition Order by the Secretary of State. The HR Manager is responsible for this and records the outcome of the check on the SCR. We also carry out this check on peripatetic music and sports coaches i.e. anyone who has responsibility for independent delivery of teaching.

From August 2015 there is also a Prohibition from Management (section 128) of Independent Schools check required for proprietors, Senior Management, Senior Leadership, Heads of Department or Subject appointed after this date. This is relevant to staff moving accepting internal appointments.

#### **Disqualification by Association**

From 31 August 2018, disqualification by association ceased to apply when childcare is provided in non-domestic settings i.e. schools. This check is therefore not applicable for staff appointed after this date.

#### **Self-Declaration**

From January 2015 all staff working with children in our EYFS setting at any point in the school day and before/after school, as well as those working with children under 8 in before or after school 'care', and those directly involved in the management of this provision, are subject to an additional check. They must complete a self-declaration form to declare that to the best of their knowledge they:

- are not barred from working with children
- have never been cautioned for, convicted of or charged with certain violent and/or sexual criminal offences against children and/or adults, at home or abroad
- have had no other orders made against them relating to their care of children
- have never had their registration cancelled in relation to childcare or children's homes or been disqualified from private fostering

For the avoidance of doubt, all classroom teachers, Teaching Assistants, support staff and School Leadership therefore have to complete these checks.

### **Confidentiality and Record**

The school respects the confidentiality of, and stores securely, locked in the HR Manager's Office, the details of and any document relating to the above checks on staff. On written request to the Headteacher at Banstead Prep School, will allow access to these documents only to the person who is the subject of the evidence, the Chief inspector, the Secretary of State or any authorised person conducting an inspection under section 162A of the Education Act (2002). Banstead Prep School retains these documents for 7 years to aid with the writing of references or in case any legal process requires them.

### **Non-Suitability**

- It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position in the school. If the school receives an application from a disqualified person or has serious concerns about an applicant's suitability to work with children, the Headteacher will report the matter to the DBS, Police and via the DCSF Children's Safeguarding Operations Unit to the Secretary of State.
- Any false information supplied by the applicant in, or in support of their application will be considered and where necessary reported.

Banstead Prep School has a legal duty to report to the Disclosure and Barring Service (DBS) details of anyone whom they refuse to employ on the basis that they believe them to be unsuitable to work with children. Anyone dismissed from Banstead Prep School (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children will be reported to the relevant authorities. Details are set out in our Child Protection Policy.

### **Appointment of Members of the Local Governing Body and UCST Governing Body**

Checks on suitability are made by the school on new members of the Local Governing Body and their appointment to the body is conditional on the checks being met. Where listed the procedure is the same as any member of staff. The checks are carried out by the HR Manager and an entry is made on the school's SCR. The LGB does not have direct contact with pupils. However, the following checks are made:

- Enhanced DBS Check and Barred List
- Check on identity
- Check on right to work in the UK
- Further checks if the applicant lives or has lived outside the UK
- References
- Prohibition from management checks

As with staff, for members of the LGB, the above information will be recorded on the Single Central Record and the name of the person verifying the documentation and the date of their check recorded. From October 2020 the LGB application and declaration form is used for the appointment of new LGB members.

The Chair of the UCST Board (Banstead Prep School governing body) is subject to an enhanced DBS check counter-signed by the Secretary of State. The UCST Central Office is responsible for the checks and records of all UCST Board members and Central Office employees who visit or work in the school from time to time. Details of these checks are entered into the SCR held by UCST Central Office. Central Office employees carry identity badges when visiting or working in schools which state their enhanced DBS check number.

### **Documents given to all staff**

Prior to starting, staff are sent a copy of Part I of *KCSIE* and Annexe A as well as the school's Child Protection Policy and Student-Staff Relationships Letter. They sign to confirm they have received and read these documents. Any member of staff with access to IT services must also





sign the ICT Acceptable Use Policy. On an annual basis all staff have to confirm that they know of no reason why they should not work with children and must also confirm that they know where to access all relevant policies.

### **Induction Training**

Once a member of staff/peripatetic/volunteer joins BPS, ideally prior to starting, but within 7 days, they have their induction with the HR Manager. All new staff members/peripatetic/volunteers must complete our online training in Child Protection and The Prevent Duty, ideally prior to starting. Additional Safeguard training takes place regularly and is carried out by our DSL. Staff sign to confirm they have received this training and relevant policies and a record is made on the Single Central Record. Staff also receive online training in Health & Safety and Fire Safety, Essential First Aid and GDPR. Where possible these are completed prior to starting. Additional training is given where necessary to staff members.

### **Pre- Employment Checks for Supply Teachers/Outside Agency Checks**

Banstead Prep School only uses teachers from supply agencies on rare occasions.

Banstead Prep School recognises the need to ensure the suitability of any person using the school site or working externally with Banstead Prep School pupils on activities organised by the school. When using external contractors or organisations, the school requests confirmation from the company concerned that all the necessary suitability checks have been made on their staff. An entry for the company is then made in the SCR. If a company fails to confirm that all the necessary checks have been made before working on site and/or with Banstead Prep School pupils, the school will suspend use of its services.

ID checks are made on arrival at the school. Chartwells Catering do their own ID checks on arrival at the school of a supply worker and copies are given to the HR Manager. Full recruitment checks are carried out by Chartwells and details given to the HR Manager.

### **Existing Members of Staff**

The 'Pre-Employment' checks will also be made against existing members of staff appointed before 1<sup>st</sup> May 2007, who cause concern over their suitability to work with children or take up a new post involving greater responsibility for children. The results will be recorded on the Single Central Record.

Staff appointed from 1<sup>st</sup> September 2003 will have been checked to confirm medical fitness, previous employment history, character and professional references. From September 2013, those staff in our EYFS setting have also been asked to confirm that they are not taking medication likely to impair their ability to carry out their duties. This is in addition to the checks already made which include an enhanced DBS check disclosure and Barred List checks. Staff appointed before 1<sup>st</sup> March 2002 will have Barred List check, but the school has also carried out a programme of enhanced DBS checks on all staff appointed before this date. All information will be recorded on the Single Central Record by the HR Manager.

### **Procedure for Leavers**

Any member of staff, supply staff, trainee or person employed by the school or contracted by the school, or any volunteer or pupil who is dismissed, their contract not renewed, or expelled because they are no longer considered suitable to work with children, will be reported by the Headteacher within one month of their leaving, to the DBS, PO Box 110, Liverpool, L69 3EF.

- The Headteacher's report will include as much detail of the case as possible. This also includes any individual who leaves the school whilst under an investigation over suitability to work with children.

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- DfE Census forms are completed by the Deputy Head who returns the completed documentation to the DfE. All forms are copied and retained by the PA to the Headteacher.

### **Training**

As a minimum, the following staff are trained in safer recruitment and one of them will always be on the interview panel:

- Jon Chesworth – Headteacher
- Sarah Nunn– Deputy Head, SLT
- Faye Landreth, HR Manager
- Sharon Pullen, Business Manager, SLT
- Julie Windett, Assistant Head - Operational and Safeguarding, SLT
- Hayley Compton, Nursery Leader, SLT
- Julia Adams, PA to Head and Office Manager

### **EYFS Staff Paediatric First Aid Training**

All Nursery Practitioners and Nursery Assistants have full Paediatric First Aid training when they join BPS. This is maintained throughout their employment.

### **Child protection risk assessments (CPRA)**

On the rare occasion an enhanced DBS check does not arrive before a member of staff's start date, the HR Manager will alert the staff member, Headteacher and other relevant staff, and put in place a special risk assessment. A Risk Assessment is written and signed by the Headteacher and all relevant staff are kept updated regarding progress. The new staff member is informed of the following at induction or via email:

- a) Explaining the reason for the CPRA
- b) Drawing attention to the school's Child Protection policy and to the advice about conduct contained in the United Learning Staff-Student Relationships letter
- c) Clearly listing any restrictions in place temporarily (e.g. no one-to-one coaching or accompanying residential visits)
- d) Explaining how the situation will be monitored (every fortnight), including the name of the person monitoring.

A copy of this letter must be signed by the person concerned and held in their personnel file. Whilst in place the risk assessment will be reviewed regularly. When the clear enhanced DBS check comes through, the member of staff must be informed in writing (usually via email) that the restrictions on their work have been lifted and the Headteacher and their line manager must also be informed. The SCR is updated with this information.

**Review:** Effective implementation of the Safer Recruitment policy is reviewed annually by the Local Governing Body on behalf of the UCST board as part of their review of Child Protection Policies. The date of the next review is November 2021.

FL Updated November 2020  
FL Further update January 2021  
FL Further update March 2021