



City of London School Safer Recruitment Policy

1 Introduction

- 1.1 City of London 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's explicit statement is as follows:

City of London School is committed to safeguarding and promoting the welfare of children and vulnerable adults and expects all staff and volunteers to share in the commitment.

- 1.2 The School is also committed to providing a supportive and flexible working environment to all of 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.
- 1.3 This Policy has been drawn up in line with Part 4 (Suitability of staff, supply staff and proprietors) of the Independent Schools Standards Regulations and has been updated in accordance with the Department for Education (DfE)'s *Keeping Children Safe in Education – statutory guidance for schools and colleges*¹.

2 The aims of this policy

The School aims to:

- 2.1 ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position.
- 2.2 ensure that all applicants are considered equitably and consistently.
- 2.3 ensure that no applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

¹ See <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

- 2.4 ensure compliance with all relevant recommendations and guidance including the recommendations of the DfE in Safeguarding Children and Safer Recruitment in Education and the code of practice published by the Disclosure and Barring Service (DBS).
- 2.5 ensure that the School meets its commitments to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

3 Recruitment Process

3.1 The recruitment process is designed to ensure the suitability of persons appointed as members of staff at the School, such that:

- No such person is barred from regulated activity relating to children in accordance with section 3(2) of the 2006 Act where that person is or will be engaging in activity which is regulated activity within the meaning of Part 1 of Schedule 4 to that Act
- No such person carries out work, or intends to carry out work, at the School in contravention of a prohibition order, or any direction made under section 128 of the 2008 Act or section 142 of the 2002 Act, or any disqualification, prohibition or restriction which takes effect as if contained in either such direction
- The School carries out appropriate checks – which must be completed before a person’s appointment – to confirm in respect of each such person the person’s identity, medical fitness, right to work in the UK and, where appropriate, the person’s qualifications
- Where relevant, an enhanced criminal record check is made in respect of that person and an enhanced criminal record certificate is obtained before, or as soon as practicable after, that person’s appointment
- Further checks are made as the School considers appropriate in the case of any person for whom, by reason of that person living or having lived outside the UK, obtaining such a certificate is not sufficient to establish the person’s suitability to work in a school

3.1.1 Advertising

All posts are advertised clearly stating that they are exempt from the Rehabilitation of Offenders Act 1974, Exceptions Order 1975 (as amended in 2013) and as part of the selection process the successful applicant will be required to obtain a Disclosure and Barring Service enhanced check. The School’s safeguarding statement is also included in all job advertisements:

City of London School is committed to safeguarding and promoting the welfare of children and applicants must be willing to undergo child protection screening appropriate to the post, including checks with past employers and the Disclosure and Barring Service.

3.1.2 Recruitment Personnel

When a position becomes vacant the Director of Studies, in the case of teaching staff, or the Bursar, in the case of support staff, will, in collaboration with the HR Manager,

undertake procedures to ensure a safe and successful appointment. A member of staff with appropriate Safer Recruitment training will be involved in the Selection Panel for all appointments. Safer recruitment training has been undertaken by the HR Manager and members of the Senior Management Team.

3.1.3 For the recruitment of Academic Staff

The Head, assisted by SMT and the appropriate Head of Department, will lead on the recruitment process.

3.1.4 For the recruitment of Support Staff

The Bursar, assisted by the HR Manager and, if required, members of the SMT and the relevant Head of Department, will lead on the recruitment process.

3.2 Application Form

The application form (see Appendix 1 for Teaching staff; a similar online application form is used by the City of London Corporation for Support Staff) used by the School clearly state that posts are exempt from the Rehabilitation of Offenders Act. All applicants are required to complete the form as fully and effectively as possible, and application forms must be fully completed to ensure that the Selection Panel receives consistent and equal information from all applicants.

The application form requires the applicant's full name and any previous name and date of birth. It also requires the applicant's full education, employment, volunteering and other history with no gaps. Reasons for leaving all previous posts are requested. All applicants must provide the names of two referees including the current or most recent employer. All applicants must disclose all convictions spent and unspent. CVs are not accepted as an alternative to the application form.

3.3 Job Description, Person Specification and School / Department Information²

These contain the School's safeguarding statement and state clearly the need for an enhanced DBS check. The job description lists the main responsibilities and duties of the position which the successful applicant will undertake and makes reference to the responsibility for safeguarding and promoting the welfare of children. The person specification details the skills, experience and qualifications the School is looking for and includes specific reference to suitability to work with children. The School / Department Information gives candidates up-to-date information about the School and the specific department.

3.4 Selection of candidates and Short-listing

3.4.1 All application forms received will be carefully read and considered independently by the Selection Panel and a short-list drawn up.

3.4.2 For main scale teaching posts, the Head, Director of Studies and relevant Head of Department liaise and select.

² Examples are available from the HR Manager.

- 3.4.3 For Heads of Department posts, the Head liaises with the Director of Studies and other members of the SMT as required.
- 3.4.4 For SMT posts, the Head liaises with the Senior Deputy Head and other members of the SMT as required.
- 3.4.5 For candidates not short-listed, the Director of Studies records for each candidate the reasons for not short-listing (see Appendix 4). These records are retained by the HR Manager for 12 months.
- 3.4.6 For Support Staff posts, the HR Manager short-lists with the Bursar or the relevant member of SMT member or Head of Department. For candidates not short-listed, the HR Manager records for each candidate the reasons for not short-listing (see Appendix 5). These records are retained by the HR Manager for 12 months.
- 3.4.7 Applications for internal posts are considered by the relevant members of the SMT.

3.5 Interview

3.5.1 Teaching staff

The Director of Studies will co-ordinate all teaching interviews and will liaise directly with SMT, Head of Department, HR Manager and applicants short-listed. Heads of Department contact candidates to discuss the lesson(s) they will be required to teach and the HR Manager contacts them regarding the practical arrangements of the interview visit (see, for example, Appendix 6).

3.5.2 Prior to or during the interview, candidates will be informed that:

- proof of ID, address and qualifications must be brought in on the interview day (to ensure right to work in the UK)
- references will be requested, including making contact with the School at which the applicant last worked, if he or she is not currently working in a school (in order to confirm employment details and reasons for leaving)
- all pre-employment checks must be completed before an appointment can be confirmed
- the interview panel will ensure that any discrepancies and anomalies are scrutinised during the interview process, including accounting for any gaps in education and employment (see *Previous Employment History* section below)
- the interview panel will ensure that candidates' suitability to work with children is explored

3.5.3 Support staff

The HR Manager will co-ordinate all support staff interviews with the Bursar and relevant members of the SMT or Head of Department. The interview procedure (as above) will be followed, in line with the City of London Corporation Human Resources Policy³.

³ See <https://corpoflondon.sharepoint.com/sites/Intranet/SitePages/HR-Topic-Recruitment.aspx>

3.5.4 **Following the interview, for all Staff**

Notes taken at interview and in the Decision Meeting will be dated and retained on file by the HR Manager. Notes taken with regard to unsuccessful candidates are retained for a period of time to allow the provision of feedback where requested; such requests are directed to the Director of Studies (for Teaching Staff) or HR Manager (for Support Staff).

3.6 **Recruitment Checks**

3.6.1 **Barred List / List 99 and Prohibition from Teaching checks**

A Barred List / List 99 check is required for all new appointments to the School. This is normally conducted as part of a DBS check (see below), but a separate barred list check must be undertaken in the event that:

- a new enhanced disclosure with barring information is required but is not received in advance of a member of staff starting work in regulated activity
- a pre-existing enhanced DBS check is accepted under the 'three-month rule' for a member of staff starting work in regulated activity
- a pre-existing enhanced DBS check without barring information is accepted from a candidate who has subscribed to the DBS update service

Teaching Staff appointments will be subject to checks by the HR Manager to determine that they are not subject to a prohibition order issued by the Secretary of State, or other similar sanction or restriction imposed as a teacher.

3.6.2 **DBS Disclosure**

An enhanced criminal records check ('DBS check') is required for all new appointments to the school. This includes volunteers and School Governors. DBS checks are carried out by HR staff at the School and/or, for Support Staff and Governors, by HR staff at the City of London Corporation. These checks are repeated every three years. During employment with the City of London School, all staff are required to declare any convictions, cautions or reprimands, warnings or bind-overs.

Where a member of staff moves from a non-teaching to a teaching role, additional checks may be required under *Teaching checks* (above).

If the disclosure is delayed (such that the DBS certificate has been applied for but is not available before a person starts work in regulated activity), the Head may allow the member of staff to commence work subject to the following pre-conditions:

- a satisfactory check of the Barred List has been completed
- all other relevant checks have been completed satisfactorily
- it is done without the School confirming the appointment
- appropriate safeguards have been put in place, as determined by a risk assessment (carried out by the Head / Senior Deputy Head / Bursar), and which have been clearly communicated to the member of staff and which will

be regularly reviewed (until such time as the DBS certificate is available; see below). A copy of any such risk assessment will be retained by HR staff.

Note: Guidance on risk assessment criteria, together with the Risk Assessment pro-forma which must be completed and signed off by the relevant authority before an individual starts work, is provided at Appendix 8. If the risk is assessed at 'Medium' or 'High', the person should not start work until all proper checks have been completed. The risk assessment must be reviewed every two weeks and re-signed (where required) until all other checks are satisfactorily completed. If, at any stage, the new member of staff's behaviour is of concern, or the protection measures are not able to be implemented or sustained, then the permission to work must be withdrawn until such time as all other checks are satisfactorily completed.

Reference is made to the 'Flowchart of Disclosure and Barring Services Criminal record checks and barred list checks' in the DfE's *Keeping Children Safe in Education*⁴.

3.6.3 Identity Checks

All candidates must prove their right to live and work in the UK. They must bring to their interview (or, as requested, immediately thereafter) proof of identity and National Insurance number. Acceptable proofs of identity and NI number include a British passport, passport/Identity card issued by an EEA country or a passport from another country that contains a valid Visa/Permit, NI card or recent P60/P45.

Applicants are also required to provide proof of address (such as a utility bill, bank statement or similar) on the interview day (or immediately thereafter, if so agreed).

Applicants who are unable to bring these proofs of identity and address to interview **must** do so before taking up appointment.

3.6.4 Medical Fitness

All successful applicants are required to complete a medical questionnaire to ensure the appropriate level of physical and mental fitness before any offer of appointment is confirmed. The School will require all appointed teaching staff and certain categories of support staff, as appropriate, to have a medical check-up prior to taking up the post. (Please also see *Equal Opportunities* below.)

3.6.5 Previous Employment History

Complete information about previous education and employment must be provided along with satisfactory explanations for any gaps in employment. The School will require applicants to explain at interview any employment gaps apparent from their application form.

3.6.6 References

Two professional references must be provided, one of which will be from the candidate's current (or most recent) employer. These should always be sought and

⁴ See <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>.

obtained directly from the referee and their purpose is to provide objective and factual information to support the appointment decision (see Appendices 2 (Teaching Staff) and 3 (Support Staff⁵) for the standard reference request forms). Any discrepancies or anomalies must be followed up. Direct contact by telephone is required with each referee to verify the reference. Referees are required to answer specific questions about the candidates' suitability to work with children. If a verbal reference is taken (over the telephone), then notes are taken, dated and signed and filed.

Any information provided through references concerning past disciplinary action or allegations that are disclosed should be considered carefully when assessing the applicant's suitability for the post.

3.6.6 References for internal positions

Two references should also be obtained for recruitment for internal positions (where an existing member of staff applies for a role or position within the School) including for:

- internal promotions
- position moves
- new, but not renewed, responsibility allowances

Typically, one reference will be sought from the member of staff's line manager and a second one from a senior member of the teaching staff. These references are supplied on a standard form available from the HR Manager.

3.6.7 Qualification Requirements

Applicants must be able to demonstrate they have obtained any academic or vocational qualifications legally required for the post and claimed by them in their application form and which were taken into account when making the appointment. Applicants will be asked to provide original copies of these when attending interview. Applicants who are unable to bring these to interview must do so before taking up appointment.

3.6.8 Overseas checks

If, because of a person living or having lived outside of the UK, a DBS check is not considered sufficient to establish suitability to work in a school, the School will carry out such further checks as deemed necessary, in line with relevant DfE and Home Office guidance. All new appointments where persons are living or have lived outside the UK will be subject to such additional checks. The HR Manager will be responsible for co-ordinating these. The HR Manager will coordinate the checking for evidence of permission to work (for any member of staff who is not a national of a European Economic Area (EEA) country).

⁵ References for Support Staff are normally requested by and submitted to the City of London Corporation HR staff.

3.6.8 Prohibition from management of independent schools check

For new appointments to management positions, checks must be made to ensure that a section 128 direction have not been made by the Secretary of State, precluding that person from a management role.

Such management positions include:

- The Head
- All staff on the Senior Management Team
- Teaching positions with Head of Department responsibility
- Proprietors

3.7 Conditional Offer of Appointment

An offer of appointment will be made only after the satisfactory references have been received (written and / or verbal) and after approval by the Head (for Teaching Staff) or the Bursar (for Support Staff).

The letter of appointment will make it clear that the offer is subject to satisfactory completion of the following:

- The receipt of two satisfactory written references, one of which must be from the candidate's current or most recent employer
- A satisfactory medical assessment (and, if considered desirable, follow up examination by the Occupational Health Physician)
- Verification of the candidate's qualifications, where those are an essential requirement for the post
- Proof of the candidate's right to work in the UK⁶
- Proof of address (e.g. a utility bill (not a mobile phone bill), dated within the past 3 months, or confirmation from the electoral register)
- A satisfactory Disclosure and Barring Service Check enhanced check

4 Supply Staff and Trainee / Student teachers

4.1 When a Supply Agency is used to provide temporary Teaching Staff to the School, the Senior Deputy Head will ensure that the agency supplies appropriate documentation giving details of all the checks that the agency has carried out on that person to ensure that they are suitable to work in the School. That documentation will be retained by HR staff.

4.2 When a Supply Agency is used to provide temporary Support Staff to the School, the HR Manager will ensure that the agency supplies appropriate documentation giving details of all the checks that the agency has carried out on that person to ensure that they are suitable to work in the School. That documentation will be retained by HR staff.

⁶ The school is required to ask all applicants for this information under the Immigration, Asylum and Nationality Act 2006.

- 4.3 With trainee or student teachers who are on temporary positions in the School, the member of the SMT with oversight of such persons and the HR Manager will ensure that the all necessary checks are completed (in line with the checklist in Appendix 7).

5 The Proprietor

- 5.1 The School, in conjunction with City of London Corporation HR staff, undertakes to perform all such checks as are required to confirm the suitability of 'the Proprietor', as outlined in Paragraph 20 of Part 4 of the Independent Schools Standards Regulations.

6 Staff Induction and Training

6.1 Safeguarding and Child Protection

All appointed staff are advised as to the identity of the Designated Safeguarding Lead (and Deputies) and are provided with the following documents and are required to sign a register to confirm they have been read and understood:

- Child Protection Policy
- Safeguarding Code of Conduct
- DfE - Keeping Children Safe in Education
- DfE - What to do if you think a child is being abused
- Health and Safety Statement

Child protection is also covered in the induction training for all staff. There is also the mandatory child protection online course that staff are required to complete.

- 6.2 Further guidance can be found in the New Staff Induction Handbook, available from the HR Manager.

7 Equal Opportunities

- 7.1 The promotes employment practice designed to eliminate discrimination. All applicants are provided with an equal opportunities monitoring form to complete.

- 7.2 The School aims:

- to ensure that no job applicant receives less favourable treatment on the grounds of sex, race, colour, religion, disability, ethnic or national origins, sexual orientation or social class
- that all applicants will be treated equally and fairly in the recruitment process outlined in this policy

- that the successful applicant will be recruited (and subsequently trained) on the basis of ability, experience and skill to undertake the job successfully as defined within the job description and person specification.

7.3 Further information and guidance is given in the City of London Corporation Equal Opportunities in Employment Policy, which is available from the HR Manager.

8 Review of Policy

Last reviewed by:	Richard Brookes (Senior Deputy Head), Charles Griffiths (Bursar) & Sheetal Gill (HR Manager)
Date last reviewed:	March 2019
Approved for the Governors (representing the City of London Corporation):	 James Thomson (Chair of Governors)
Date:	13 March 2019