

0. Review of Policy

- 0.1 This policy is reviewed annually, or more regularly as required, prior to approval by governors.

Last reviewed by:	Richard Brookes (Senior Deputy Head), Charles Griffiths (Bursar) & Chelsea Wightman (HR Officer)
Date last reviewed:	September 2020 (changes as shown)
Approved for the Governors (representing the City of London Corporation) by:	Board of Governors
Date:	8 October 2019

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 for 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 should be read in conjunction with:
- The School's Safeguarding and Child Protection Policy
 - The City of London Corporation's Code of Conduct (and Code of Conduct for Teachers)
 - The City of London Corporation's Whistleblowing Procedure
- 1.4 This policy has been drawn up in line with Part 3 (Welfare, health and safety of pupils), Paragraph 7 (Safeguarding) and Part 4 (Suitability of staff, supply staff and proprietors), Paragraphs 18 (Appointment of staff), 19 (Appointment of supply staff), Paragraph 20 (The

chair of a body of persons; and member of a body of persons, not including the chair) and Paragraph 21 (SCR contents for staff; supply staff; and proprietors) of the Independent Schools Standards Regulations and has been updated in accordance with Part 3 (Safer Recruitment) of the Department for Education (DfE)'s *Keeping Children Safe in Education: statutory guidance for schools and colleges*¹ (September 2020).

2. The aims of this policy

2.1 *Keeping Children Safe in Education: statutory guidance for schools and colleges* (September 2020) states:

“Governing bodies and proprietors should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. The School or College should have written recruitment and selection policies and procedures in place”.

2.2 Through the implementation of this policy, the School aims to ensure:

- that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position.
- that all applicants are considered equitably and consistently.
- 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.
- that the School creates a culture of safe recruitment and, as part of that, adopts recruitment procedures that help deter, reject or identify people who might abuse children.
- 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.
- 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).

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

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

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 that 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 advertisements²:

“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 Head of Department, in the case of Support Staff, will, in collaboration with HR (and, for Support Staff, the Bursar), 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** appointments³. Safer recruitment training has been undertaken by the HR team, all members of the Senior Management Team and other staff as required.

3.1.3 **For the recruitment of Teaching 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 Head of Department, assisted by HR and the Bursar, if required, members of the SMT, will lead on the recruitment process.

² As displayed in recruitment information, including job adverts and application forms.

³ The School Staffing (England) Regulations (2009) require governing bodies of maintained schools to ensure that at least one of the persons who conducts an interview has completed safer recruitment training; the School also operates in line with this requirement.

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 states that posts are exempt from the Rehabilitation of Offenders Act. All applicants are required to complete the form as fully and effectively as possible 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 Information**

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. Person Specifications generally outline 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 The HR team will provide a list of candidates for shortlisting. In conjunction with the City of London Corporation Equal Opportunities in Employment Policy, all application forms received will be appropriately filtered by HR to help prevent unconscious bias. The application forms will be read carefully and considered independently by the Selection Panel and a short-list drawn up and provided to HR.

- For main-scale Teaching Staff posts, the Head, Deputy Head (Teaching and Innovation), Director of Studies and the relevant Head of Department liaise and select.
- For Head of Department posts, the Head liaises with the Deputy Head (Teaching and Innovation), Director of Studies and other members of the SMT as required. Where appropriate and required, external experts in the relevant field may also be consulted.
- For Senior Management posts, the Head liaises with the Senior Deputy Head and other members of the SMT as required. Where appropriate and required, external experts in the relevant field may also be consulted.

3.4.2 For candidates not short-listed, the Director of Studies (or, where appropriate, another member of the SMT) records for each candidate the reasons for not short-listing (see Appendix 4). These records are retained by the HR team for 12 months.

3.4.3 Applications for internal posts (including positions of responsibility) are considered by the relevant members of the SMT.

3.4.4 For Support Staff posts, the Head of Department short-lists the candidates, liaising with the Bursar (and, as required, with other senior members of staff), and provides

the shortlisting grid to HR. HR check and approve the short-listing grid, and retain a copy of this for 12 months.

- 3.4.5 For **Support Staff** candidates not short-listed, the **Head of Department** records for each candidate the reasons for not short-listing (see Appendix 5). These records are retained by the **HR** for 12 months.

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** and applicants short-listed. Heads of Department contact candidates to discuss the lesson(s) they will be required to teach, and **HR staff** contacts them regarding the practical arrangements of the interview visit (e.g. see 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 explore the candidates' suitability to work with children.

3.5.3 **Support staff**

City of London Corporation HR and local HR staff will co-ordinate all support staff interviews with the **Head of Department** (and relevant members of the SMT or **the Bursar**). The interview procedure (as above) will be followed, in line with the City of London Corporation **Recruitment and Selection Policy**⁴.

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 **HR**. Notes taken with regard to unsuccessful candidates are retained for a **minimum of 12 months** 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).

⁴ See <https://corpoflondon.sharepoint.com/sites/Intranet/SitePages/HR-Topic-Recruitment.aspx>

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 HR 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 Disclosure⁵

An enhanced criminal records check (‘DBS check’) is required for all new appointments to the school. This includes volunteers and School Governors (see below). 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 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.

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), 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 proforma which must be completed and signed off by the relevant authority before a person 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.

⁵ 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*.

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, when requested, immediately thereafter) proof of identity and National Insurance number. Acceptable proofs of identity include a British passport or current driving licence, passport / identity card issued by an EEA country or a passport from another country that contains a valid Visa / Permit, and acceptable proofs of NI number include a 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, where agreed, immediately thereafter).

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

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. (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 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 Staff⁶) 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 candidate's 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

⁶ References for Support Staff are normally requested by and submitted to the City of London Corporation HR staff.

- 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 local HR team](#).

3.6.7 **Qualification Requirements**

Applicants must be able to demonstrate they have obtained any academic or vocational qualifications relevant to 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 and before the appointment is confirmed.

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. [HR](#) will be responsible for co-ordinating these, and for coordinating 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).

Where a person is an overseas-qualified teacher, the School will follow the Teaching Regulation Authority (TRA) guidance on requirements for overseas-qualified teachers and will ensure staff have the relevant qualifications.

3.6.9 **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 (see below)

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 Head of Department with the Bursar and / or HR Manager \(for Support Staff\)](#).

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 UK⁷.
- 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 Temporary Teaching Staff from a Supply Agency are required to show current photo ID and their DBS certificate when they arrive at the School. This documentation will be retained by HR staff.
- 4.3 When a Supply Agency is used to provide temporary Support Staff to the School, HR 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.
- 4.4 With trainee or student teachers who are on temporary positions in the School, the member of the SMT with oversight of such persons (the Deputy Head (Teaching and Innovation)) and HR staff will ensure that the all necessary checks are completed (in line with the [New Starter checklist in Personnel Files](#)).

5. Governors (The Proprietor)

- 5.1 **DBS, Barred List and Prohibition checks for Governors**
The DBS maintains 'barred lists' of individuals who are unsuitable to work with children. Where barred list information is requested, and 'children's workforce independent schools' is specified in the parameters for that check, the certificate will also detail whether the applicant is subject to a direction made under section 128 of the Education and Skills Act (2008). Such a direction prohibits an individual from taking part in the management (including being a governor) of independent schools in England.
- 5.2 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 governors ('the Proprietor', as described in Part 4, Paragraph 20 of the Independent Schools Standards Regulations).

⁷ The school is required to ask all applicants for this information under the Immigration, Asylum and Nationality Act 2006.

6. Staff Induction and Training

6.1 Safeguarding and Child Protection

All appointed staff are provided with the following documents, and they are required to sign a register to confirm they have been read and understood them:

- The Safeguarding and Child Protection Policy (including the Staff Safeguarding Code of Conduct) and the identity and role of the Designated Safeguarding Lead (DSL) and Deputy DSLs
- The Staff Code of Conduct, including the Whistleblowing Procedure
- The Behaviour Policy for pupils
- The Digital Safety Policy
- Part 1 of the DfE's *Keeping Children Safe in Education* (including Annex A for those who work directly with children)
- The DfE's *What to do if you think a child is being abused*
- The School's Health and Safety Policy

Safeguarding and Child Protection is also covered in the induction training for all staff (including, where appropriate, an online child protection course), which includes the arrangements for Children Missing in Education (included in the Attendance and Registration Policy).

6.2 Further guidance can be found in the New Staff Induction Handbook, available from the Staff Intranet, Deputy Head (Teaching and Innovation), or [HR team](#).

7. Equal Opportunities

7.1 The School promotes employment practices 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 applicant for a job receives less favourable treatment on the grounds of:
 - sex
 - age
 - disability
 - sexual orientation
 - gender reassignment
 - religion or belief
 - race (including colour, ethnic or national origins)
 - pregnancy and maternity
 - marriage and civil partnership
- all applicants will be treated equally and fairly in the recruitment process outlined in this policy
- the successful applicant will be recruited (and subsequently trained) on the basis of ability, experience and skill(s) 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 team](#).

8. Record Keeping & Confidentiality

- 8.1 In line with the City of London Corporation's Recruitment and Selection Policy, the original applications of all applicants, together with a brief written record detailing the reasons for their rejection or inclusion at each stage of the process, will be retained securely for a minimum of 12 months from the date of an appointment decision is made; at that point, it will then be destroyed securely.
- 8.2 It should be noted that documentation may be released to a third party in the event of a complaint to an Employment Tribunal or Data Protection request. Recruiting managers must return all relevant recruitment and selection documentation.
- 8.3 Applicants are entitled to request the erasure of their personal data, held by the School, under Article 17 of the General Data Protection Regulation (GDPR).

Appendix 1: City of London School Teaching Staff Application Form

- This is available from the HR department: HR@cityoflondonschool.org.uk

Appendix 2: Reference Request Form for a Teaching Staff post

- This is available from the HR department: HR@cityoflondonschool.org.uk

Appendix 3: Reference Request Form for a Support Staff Post

- This is available from the HR department: HR@cityoflondonschool.org.uk

Appendix 4: Short-listing Assessment Form for Teaching Staff

- This is available from the HR department: HR@cityoflondonschool.org.uk

Appendix 5: Short-listing Assessment Form for Support Staff

- This is available from the HR department: HR@cityoflondonschool.org.uk

Appendix 6: Example of Arrangements for Interview / Selection visit for Teaching Staff

Name Period & Time	Candidate A	Candidate B	Candidate C	Candidate D	Candidate E
1 09.10-09.50	Interview with Head of Department & Director of Studies (30 minutes)	Tour of the School with the Assistant Head (30 minutes)	Teach CLR's 1L 426	Interview with Head and Senior Deputy Head (25 minutes)	
2 09.50-10.30	Tour of the School with the Assistant Head (30 minutes)	Teach WER's1V 426	Interview with Head of Department & Director of Studies (30 minutes)		Interview with Head and Senior Deputy Head (25 minutes)
3 10.30-11.10	Teach WER's 2K 426	Interview with Head of Department & Director of Studies (30 minutes)	Interview with Head and Senior Deputy Head (25 minutes)	Tour of the School with the Assistant Head (30 minutes)	
11.10-11.30	Coffee in Common Room, Level 2 South				
4 11.30-12.10		Interview with Head and Senior Deputy Head (25 minutes)			Tour of the School with the Assistant Head (30 minutes)
5 12.10-12.50	Interview with Head and Senior Deputy Head (25 minutes)		Tour of the School with the Assistant Head (30 minutes)		Interview with Head of Department & Director of Studies (30 minutes)
12.50-14.00	Lunch in Staff Dining Room with Classics Department				
6 14.00-14.40				Interview with Head of Department & Director of Studies (30 minutes)	Teach CLR's 2W 426
7 14.40-15.20				Teach ZLC's 1S 428	

Appendix 7: Safer Recruitment Checklist

Item	Description	Checked by	Date
1	Application Form including signed/typed name declaration with regards to criminal record and suitability for working with children.		
2	Equal Opportunities Monitoring Form.		
3	Full employment history (gaps in Application Form will be scrutinised by short-listing/interview panel prior to any appointment)		
4	Check of identity/address/National Insurance number and right to work and live in the UK.		
5	Disclosure and Barring Services Check ('Enhanced DBS')		
6	Prohibition from teaching check		
7	Prohibition from Management check (for Senior Management)		
8	Written references x 2 (to include last employer)		
9	Verbal reference x 2 (for the successful applicant) – notes need to be taken and filed		
10	Interview notes – kept for required period		
11	Proof of relevant qualifications		
12	Satisfactory Medical Clearance		
13	Approval for hire from Head (for academic staff) or Bursar (for support staff).		
14	Offer letter (subject to all these and the Enhanced DBS check being fulfilled and acceptable)		
15	Contract signed and sent		

Appendix 8: Risk Assessments

- 8.1 There would need to be exceptional and justifiable circumstances for employment to commence prior to DBS clearance. Such a decision can only be taken by the Head, Senior Deputy Head or Bursar, following a risk assessment. In any circumstances, potential employees cannot commence work prior to the Barred List check being completed. Nor may they commence work prior to the submission of their completed disclosure application to the DBS.
- 8.2 There must be a record of the Risk Assessment and decision, including “sign off” by the Head, Senior Deputy Head or Bursar, to ensure the auditability and accountability of the judgement. The judgement is an assessment of the risk versus the consequences of the decision. The Risk Assessment pro-forma (see below) is to be used to act as an auditable record of the decision made following risk assessment and must contain the signature of one of the accountable persons. This responsibility cannot be delegated.
- 8.3 If a decision is taken to allow an employee to commence work prior to receiving the DBS certificate, the employee must have completed and submitted their completed disclosure application to the DBS, and their contract of employment should remain subject to this condition being met. The application’s progress within the DBS system should be checked and monitored on a regular basis.
- 8.4 Robust and reliable supervision arrangements must be put into place during the “waiting period”. The employee must be clearly notified of the supervision arrangements that are in place. The situation must be checked and monitored at least every two weeks. The Head, Senior Deputy Head or Bursar remains accountable during this time, until the clearance is received, checked and suitability confirmed.
- 8.5 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 checks have been satisfactorily completed.
- 8.6 **Risk Assessment - Key Questions for Consideration**

- 1 **What are the exceptional reasons for considering commencement of employment prior to receiving clearance?**

This should not be a natural default position, and should be exceptional and clearly linked to the circumstances identified in response to Question 2 below.

- 2 **What would be the consequences to the School’s operations of waiting until clearance is received?**

These should be exceptional and have a demonstrable substantial impact. The School should be able to demonstrate how it has used effective planning to avoid / minimise this disruption, and clearly show where this has been unavoidable.

3 **Is the employee known to the school?**

A former employee, who would have had a DBS check when working in the School, and of whom a great deal is known, will present a much lesser risk than a new employee, who is not known to at all. The more recent the departure the lower the risk.

4 **If the employee commenced work, what would be their normal level of access to children?**

- i. Unsupervised access one-to-one*
- ii. Unsupervised access to a group*

Neither of these would be acceptable arrangements in any circumstances during this “waiting period”.

- iii. Supervised access one-to-one*
- iv. Supervised access to a group*
- v. No direct access, but based within premises*

In these circumstances, if an employee does commence employment prior to clearance being received, their access must be supervised at all times. The level of risk declines the lower down the list above, but there continues to be a risk with each of these scenarios.