



Recruitment, Selection and Disclosure Policy

November 2025
(V2)

SECTION 1: Purpose and Principles

- 1.1 St Christopher School (“the School”) is committed to providing the highest standard of education and care for children and young people. Safeguarding and promoting their welfare is our paramount responsibility and underpins all recruitment and selection activity.
- 1.2 The School aims to attract, recruit and retain staff of the highest calibre who share our commitment to safeguarding, inclusivity and educational excellence. All recruitment decisions are based on merit, experience, and suitability for the role.
- 1.3 The School ensures that:
 - 1.3.1 All recruitment practices comply with relevant statutory guidance, including Keeping Children Safe in Education (KCSIE).
 - 1.3.2 No applicant is disadvantaged or treated unfairly because of a protected characteristic under the Equality Act 2010.
 - 1.3.3 Reasonable adjustments are made throughout the recruitment process where an applicant discloses a disability.
 - 1.3.4 Robust pre-employment checks are undertaken and recorded on the Single Central Record (SCR).
 - 1.3.5 At least one member of every interview panel has completed Safer Recruitment training.
 - 1.3.6 All staff are required to make an annual declaration of continued suitability to work with children, including confirmation of no new convictions, cautions, or pending court cases.
- 1.4 All members of the Senior Leadership Team are enrolled on the Disclosure and Barring Service (DBS) Update Service.

SECTION 2: Statutory Guidance & Compliance

The School ensures compliance with all relevant legislation and guidance, including, but not limited to:

- 2.1 Keeping Children Safe in Education (KCSIE)
- 2.2 Education (Independent School Standards) (England) Regulations 2014
- 2.3 Equality Act 2010
- 2.4 Working together to safeguard Children (2023)
- 2.5 Human Rights Act 1998
- 2.6 Children Acts 1989 and 2004
- 2.7 Early Years Foundation Stage (EYFS) Statutory Framework
- 2.8 National Minimum Standards for Boarding Schools
- 2.9 Disclosure and Barring Service (DBS) Code of Practice
- 2.10 Home Office in respect of immigration and right to work in the UK including Immigration, Asylum and Nationality Act 2006
- 2.11 Data Protection Legislation
- 2.12 Fixed Term Employees (prevention of less Favourable Treatment) Regulations 2002



SECTION 3: Scope

- 3.1 This policy applies to individuals directly recruited and employed by the School, including teaching and professional staff whether full time, part time, temporary or permanent.
- 3.2 For the purposes of this policy staff are defined in accordance with the Education (Independent Schools Standards) (England) Regulations 2014 as:

Any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer.

SECTION 4: Agency, Supply and Contract Workers

- 4.1 For agency or contract workers, the School shall obtain written confirmation from the supplying organisation that all relevant checks have been completed including:
 - 4.1.1 Identity verification
 - 4.1.2 Enhanced DBS check and Children's Barred List check
 - 4.1.3 Right to work in the UK
 - 4.1.4 Prohibition and sanctions checks
 - 4.1.5 Verification of qualifications
 - 4.1.6 Overseas criminal record checks (where applicable)
 - 4.1.7 Medical fitness declaration
 - 4.1.8 Two satisfactory professional references
- 4.2 The School will verify the worker's identity on arrival and review the original DBS check and record relevant details on the SCR.
- 4.3 Unchecked contractors will never be permitted to work unsupervised. The level of supervision will be determined and based on the role and risk assessment.

SECTION 5: TUPE Transfers

Where staff transfer under TUPE, the School will review and if necessary, repeat safer recruitment checks in line with statutory requirements.

SECTION 6: Disqualification from Senior Management Roles

- 6.1 Certain individuals are disqualified from acting in senior management positions within a charity. This includes:
 - 6.1.1 The Head, who has overall responsibility for day-to-day management and control of the charity.
 - 6.1.2 The Finance Strategy Lead/Director of Finance who is responsible for financial management and control.
- 6.2 Being disqualified means that a person can't take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or 'waived') the disqualification.



SECTION 7: Allegations Against Staff

- 7.1 The School follows Department for Education statutory guidance in managing allegations against staff and volunteers. This applies where a person has:
 - 7.1.1 Behaved in a way that has harmed, or may have harmed a pupil;
 - 7.1.2 Possibly committed a criminal offence against or related to a pupil;
 - 7.1.3 Behaved in a way that indicated that they may pose a risk of harm to children;
 - 7.1.4 Behaved in a way that suggests they may not be suitable to work with children; or
 - 7.1.5 Breached the Staff Code of Conduct.
- 7.2 See St Chris Child Protection, Low level concerns and Code of Conduct Policies.

SECTION 8: Other key Policies and Procedures to be referred to:

- 8.1 Child Protection Policy
- 8.2 Complaints Procedure
- 8.3 Data Protection Policy
- 8.4 Equal Opportunities Policy – Staff
- 8.5 Governors Handbook
- 8.6 Single Central Record Procedure
- 8.7 Staff Code of Conduct
- 8.8 Whistleblowing Policy
- 8.9 Visiting Speakers Policy
- 8.10 Volunteer Helpers Policy

Full details of the School's recruitment process can be found in Appendix 1 Recruitment and Selection Procedure

SECTION 9: Roles and Responsibilities

- 9.1 The Director of People is responsible for drafting and updating this policy.
- 9.2 The Head and Designated Safeguarding Lead (DSL) review and approve it before ratification by the Governing Body.
- 9.3 The People Team and Head's PA support hiring managers in all recruitment activity, providing advice, documentation, and compliance oversight.
- 9.4 All individuals involved in recruitment receive appropriate training in safer recruitment and SCR maintenance.

SECTION 10: Ongoing regular monitoring

- 10.1 This Policy is reviewed:
 - 10.1.1 Bi-annually, or sooner if legislation changes
 - 10.1.2 Through regular audits of the Single Central Record and associated recruitment files. See Single Central Record Procedure
- 10.2 Audit frequency
 - 10.2.1 Half termly: by the Head, DSL and Director of People
 - 10.2.2 Termly: by the Governor responsible for safeguarding
 - 10.2.3 Annually: by an external auditor



10.3 This policy is non contractual and may be amended at any time.

Responsible and Accountable Persons	Name	Position
Responsible	Zoe Weaver	Director of People
Reviewed by	Alistair Phillips	Designated Safeguarding Lead
	Rich Jones	Head
Accountable	Governing Body	
Date Approved	November 2025 (V2) Approved by Governors November 2025	
Review Period	Biennially	
Review Date	November 2027	

Version History	Amendment Date	Amended/Approved by Whom	Previous Version Stored Where (If Applicable)
November 2021	November 2025	Director of People amended the policy to reflect KCSIE 2025 and recruitment best practice. Approved by Head	Policy Archive folder held on Sharepoint/Policies



APPENDIX 1: Recruitment and Selection Procedure

1. Introduction

- 1.1 The purpose of this procedure is to ensure that the recruitment and selection of staff at St Chris is conducted fairly, transparently and in accordance with safer recruitment principles. The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and contractors to share this commitment.
- 1.2 Recruitment will be undertaken in accordance with the most recent statutory guidance KCSIE and other relevant legislation including the Equality Act 2010, the Data Protection Act 2018, and the Rehabilitation of Offenders Act 1974.

2. Prior to Recruitment

2.1 Justification for recruitment

The first step in all recruitment is to decide if the role is still required. Consideration should be given to how the work could be carried out including:

- 2.1.1 Could the work be divided up and carried out by several people?
- 2.1.2 Could someone be transferred internally?
- 2.1.3 Would it be better to subcontract the work?
- 2.1.4 Is the work likely to fluctuate in which case could a temporary/casual worker be better?

2.2 Authority to recruit

- 2.2.1 All positions, must be authorised by the Head before being passed to the People team/PA to the Head to recruit. This is to ensure school budgets are adhered to and a formal role review has taken place.
- 2.2.2 A Job Description and Person Specification is created using St Chris template. The skills, abilities, experience and attitudes and behaviours that are required for the role, including the safeguarding requirements are to be clearly set out. Only essential requirements are included. This will need to be signed off by SLT member/Director of People.

3 Preparation to Recruit

3.1 Recruitment timetable

Before starting the recruitment process, all those involved must consider timescales. Those responsible for recruiting should think backwards from when they need the new person to be in post, consider the length of time the advert is live, what tests and interview will be carried out and pre-employment checks required.

3.2 Advertising and promotion of vacancies

Vacancies are normally advertised on the School's "Work for Us" webpage, and where appropriate, through additional external media or specialist publications.



All adverts will:

- 3.2.1 Clearly state the School's commitment to safeguarding and promoting the welfare of children;
- 3.2.2 Outline that an enhanced DBS check (including relevant barred list information) will be required;
- 3.2.3 Reference that St Chris is an equal opportunities employer committed to equality, diversity, and inclusion.

4 Application Process

- 4.1 All applicants must complete the School's standard application form; CVs alone will not be accepted.
- 4.2 Applicants must provide a full and chronological history of employment, including dates, reasons for the history of employment and explanations for any gaps in employment. Employment history will be checked against references and any discrepancies discussed with the candidate. The Application Form will be signed off by the Recruiting Manager or People Team to confirm that all gaps have been verified. Candidates will normally be required when attending interview to provide a wet signature on the application form.

5 Shortlisting

- 5.1 Shortlisting will normally be undertaken by at least two trained panel members, one of whom must have up-to-date Safer Recruitment training.
- 5.2 Each panel member will independently assess applications against the criteria in the job description and person specification.
- 5.3 Any employment gaps, discrepancies, or anomalies will be recorded and explored at interview.
- 5.4 A record of shortlisting decisions will be retained securely.
- 5.5 The School is committed to fairness, objectivity, and inclusion. Applicants will be shortlisted solely on the basis of relevant skills, experience, and qualifications.
- 5.6 St Chris are committed to being an inclusive employer and will make any necessary reasonable adjustments or arrangements for potential applicants including sharing interview questions. to assist them in attending the interview.

6 Criminal self-disclosure (see ex-offenders policy Appendix 2)

- 6.1 All shortlisted candidates will be required to complete a self-declaration form of their criminal record, or information that would make them unsuitable to work with children for example they have a criminal history, if they are included on children's barred list, or if they are prohibited from teaching.
- 6.2 Self-declaration forms must be completed, signed and returned no later than one day prior to interview. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records.
- 6.3 If any criminal or other suitability information is disclosed the People Team/Heads PA will liaise with the Head or DSL to agree a) whether the information is protected and if not, b) how/when the disclosed information should be discussed with the candidate eg. during the interview or in a separate meeting.



- 6.4 Failure to declare any convictions (that are not subject to DBS filtering) may disqualify a candidate for appointment or result in summary dismissal if the discrepancy comes to light subsequently.

7 Online and Social Media Checks

In line with KCSIE the School conducts appropriate online searches on shortlisted candidates to help identify any incidents or issues that may be relevant to suitability to work with children.

- 7.1 Searches are carried out using open-source online platforms (e.g. Google, LinkedIn, and social media sites).
- 7.2 Searches are normally conducted by an individual not involved in the selection panel to reduce the risk of bias.
- 7.3 Findings are recorded using the Online Search Record Form and shared confidentially with the panel only if relevant to safeguarding.
- 7.4 Candidates are informed that these checks will take place as part of the recruitment process.

8 Employment References

- 8.1 We obtain references before interview where possible, to allow any concerns raised to be explored further with the referee and taken up with the candidate at interview.
- 8.2 We:
 - 8.2.1 Do not accept open references or “to whom it may concern”
 - 8.2.2 Do not rely on applicants to obtain their reference
 - 8.2.3 Ensure a reference is from the candidate’s current employer and has been completed by a senior person with appropriate authority
 - 8.2.4 Obtain verification of the individual’s most recent relevant period of employment where the applicant is not currently employed
 - 8.2.5 Secure a reference from the relevant employer for the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children then a reference from their current employer is required
 - 8.2.6 Verify any information with the person who provide the reference
 - 8.2.7 Ensure electronic references originate from a legitimate source
 - 8.2.8 Contact referees to clarify content where information is vague, or insufficient information is provided
 - 8.2.9 Compare the information on the application form with that in the reference and will explore any discrepancies with the candidate
 - 8.2.10 Ensure the reason for the candidate leaving their current or most recent post and
 - 8.2.11 Ensure any concerns are resolved satisfactorily before appointment is confirmed.
- 8.3 In the case of staff who have lived/worked abroad we will take up at least one reference from the employer in the relevant country and the referee will be verified.
- 8.4 For agency staff applying for a permanent role, internal references will be accepted but must also include external references in line with our safer recruitment practices.
- 8.5 If the candidate is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary



offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure.

- 8.6 If the candidate is not currently working with children but has done so in the past, the School will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university.
- 8.7 All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.
- 8.8 All offers of employment are subject to receipt of a minimum of two references.
- 8.9 Candidates are not automatically entitled to see their employment references.

9 Interviews

- 9.1 All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.
- 9.2 The School requests that all candidates invited to interview also bring with them:
 - 9.2.1 Photo ID: a current driving licence including a photograph or a passport.
 - 9.2.2 Utility bill or financial statement issued within the last three months showing the candidate's current name and address;
 - 9.2.3 Where appropriate any documentation evidencing a change of name;
 - 9.2.4 Where the candidate is not a citizen of a country within the European Economic Area or Switzerland, proof of entitlement to work and reside in the UK.
- 9.3 Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.
- 9.4 Interviews will be conducted by at least two panel members, one of whom has completed Safer Recruitment training. Certification for accredited courses regarding safer recruitment training is valid for three years.
- 9.5 The Head or designated member of SLT, Head of Department will normally chair the interview panel. The Chair of Governors chairs the panel for the Head's appointment.
- 9.6 The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Head/Director of People or Chair as to whether an interviewer should withdraw from the panel. Should the Chair have a conflict of interest, the Vice Chair shall decide whether the Chair should withdraw from the panel.



- 9.7 We use a range of selection techniques to identify the most suitable person for the post, linked to the job and person specification. For some roles, in addition to the standard panel interview, (which may include a pupil panel) candidates may also be asked to make a presentation or carry out a task or microteach. If this is the case, candidates will be notified in advance.
- 9.8 During the interview the recruitment panel will:
- 9.8.1 Find out what attracted the candidate to the post being applied for, and their motivation for working with children
 - 9.8.2 Explore their strengths, skills and competencies asking for examples of experience of working with children which are relevant to the role
 - 9.8.3 Assess their values and resilience to work in education
 - 9.8.4 Probe any gaps in employment or where the candidate has changed employment or location frequently, asking for the reasons
- 9.9 All candidates interviewed for all posts will be asked a mandatory question “have you at any time been subject to an interview, inquiry, children’s services or social services investigation, suspension from work, disciplinary, police investigation, caution or conviction as a result of concerns about child abuse or neglect?” As well as the mandatory question all candidates will be asked at least one question to test their motivation and understanding of safeguarding.
- 9.10 All information considered in the decision making should be clearly recorded (legible handwriting on typed online) along with the decisions made recorded on the interview template form.
- 9.11 All interview notes for successful candidates will be uploaded directly onto the candidate’s digital personal file. Interview notes for unsuccessful candidates will be safely stored for six months before being securely destroyed/deleted in line with our Data Retention Policy.

10 Conditional Offer and Pre-Appointment Checks

- 10.1 Any offer of employment is conditional upon satisfactory completion of all required pre-employment checks including:
- 10.2 Any offer to a successful candidate will be conditional upon:
- 10.2.1 Verification of identity (original documents must be provided)
 - 10.2.2 Two satisfactory references (if these have not already been received);
 - 10.2.3 Right to Work in the UK (original documents must be provided);
 - 10.2.4 Enhanced DBS check (with Children’s Barred List information where appropriate)
 - 10.2.5 Children’s Barred List check
 - 10.2.6 Where an applicant subscribes to the DBS Update Service the applicant must give consent to the School to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required
 - 10.2.7 Prohibition from teaching (where applicable). For a candidate to be employed as a teacher, a check that the candidate is not subject to a prohibition order issued by the Secretary of State Teaching work is defined in The Teachers’ Disciplinary (England) Regulations 2012 to encompass:



- 10.2.7.1 Planning and preparing lessons and courses for pupils
 - 10.2.7.2 Delivering and preparing lessons to pupils
 - 10.2.7.3 Assessing the development, progress and attainment of pupils
 - 10.2.7.4 Reporting on the development, progress and attainment of pupils;
- 10.2.8 Verification of professional qualifications, where appropriate;
- 10.2.9 Verification of successful completion of statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999);
- 10.2.10 Where the successful candidate has worked or been resident overseas such checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered;
- 10.2.11 Medical fitness declaration (that they are mentally and physical fit to carry out their work responsibilities. Where necessary confidential health pre-employment checks will be carried out by our Occupational Health provider);
- 10.2.12 Where appropriate signed Staff Suitability Declaration form showing that the candidate is not disqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006 (July 2018)”;
- 10.2.13 Section 128 check (where applicable). For a candidate to be employed into a senior management position as set out above under “Scope of this Policy”, receipt of a signed “senior charity manager positions: automatic disqualification declaration” confirming that the candidate is not disqualified from acting in a senior management position for a charity in accordance with the automatic disqualification rules for charities. Where the successful candidate will be taking part in the management of the school, a check will be carried out under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Management Team and teaching heads of department; and
- 10.2.14 For a candidate that has lived or worked outside the UK, an EEA check using the Teaching Regulation Agency employer access system for information about any teacher sanction or restriction. In addition further appropriate checks should be carried out including: criminal record checks for overseas applicants as per Home Office guidance; obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked, confirming that they have not imposed any sanctions or restrictions and/or that they are not aware of any reason as to why they may be unsuitable to work with children. Where this information is not available we will seek alternative methods of checking suitability and/or undertake a risk assessment that supports our informed decision making on whether to proceed with the appointment
- 10.3 Please note that sight of the original documents is necessary. Photocopies are not sufficient. All original DBS certificates must be verified by trained staff. The date, person and DBS number will be recorded on the Single Central Record. Once the document has been verified and the required information recorded on the SCR any copy of the DBS is destroyed.
- 10.4 No one can start until all pre-employment vetting checks have been carried out and are signed off by the Head
- 10.5 Staff who are appointed on a fixed term contract will only be appointed to a permanent position if the full recruitment, selection, and vetting processes have been followed.



11. Criminal convictions (See Ex Offenders Policy Appendix 2)

- 11.1 Any relevant criminal record disclosed by a candidate or positive DBS check must be discussed with the Head and Designated Safeguarding Lead. If a candidate with a disclosed criminal record or a positive DBS is to be offered a post, the offences must be discussed with the candidate and the result of those discussion recorded using the risk assessment form. All completed risk assessments will be submitted to the DSL for review. An offer of employment cannot be redacted based on information disclosed on an enhanced DBS without the applicant being given an opportunity to provide further information.
- 11.2 The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

12. If disclosure is delayed

A short period of work is allowed under controlled conditions, at the Head's discretion. However, if an 'enhanced disclosure' is delayed, a Head may allow the member of staff to commence work with a Risk Assessment:

- 12.1 Without confirming the appointment;
- 12.2 After a satisfactory check of the barred list if the person will be working in regulated activity and all other relevant checks (including any appropriate prohibition checks) having been completed satisfactorily;
- 12.3 Provided that the DBS application has been made in advance;
- 12.4 With appropriate safeguards taken (for example, loose supervision);
- 12.5 Safeguards reviewed at least every two weeks by the Head and member of staff;
- 12.6 The person in question is informed what these safeguards are; and
- 12.7 It is recommended, but not a requirement, that a note is added to the single central register and evidence kept of the measures put in place.

13. Single Central Record (see Single Central Record Procedure)

We maintain a single central record of pre-employment checks as set out in KCSIE. The single central record covers all staff, agency and third party supply staff (even if they work for one day), Governing Body members and volunteers.

14. Ongoing safeguarding

As part of our ongoing duty to safeguard and promote the welfare of children and young people and to ensure that staff continue to be suitable to work with children, all staff are required to make an annual declaration of no further convictions, cautions or pending court cases. All Senior Leadership team members should be on the DBS Update Service

15. Fraudulent Applications or False information

Providing false or misleading information, or failure to disclose relevant details may result in:

- 15.1 Withdrawal of an offer
- 15.2 Termination of employment if already appointed; and/or



- 15.3 Referral to the Local Authority Designated Officer (LADO), police, Charity Commission, or DBS where appropriate

16 Induction and Probation

- 16.1 All new employees will undertake a comprehensive induction programme that includes:
 - 16.1.1 Pre-onboarding training (which includes safeguarding, prevent, child protection, IT Security, Code of conduct and health and safety)
 - 16.1.2 Core induction (led by People Team)
 - 16.1.3 Departmental induction (led by Head of Department/SLT)
 - 16.1.4 Role specific induction (led by line manager)
- 16.2 Please see Induction Policy (in development) on Sharepoint.
- 16.3 All appointments are subject to a probationary period, during which performance, conduct and continued suitability to work with children are reviewed See Probational Policy held on Sharepoint (in development)

17 Ongoing Suitability to work with children and young people

Existing staff are required to:

- 17.1 Complete annual safeguarding and conduct declarations.
- 17.2 Inform the Head of any cautions, convictions, or changes in circumstances that may affect their suitability to work with children

18 Candidate feedback

As part of our commitment to good practice, we offer verbal feedback to all unsuccessful candidates after interview, where possible, within three weeks from the date of interview. We do not offer feedback to applicants that are not shortlisted for interview.

19 Complaints procedure

Any applicant who wishes to raise a concern or complaint about the recruitment process should submit this in writing to the Director of People or Head within two weeks of a selection decision being made. Complaints will be handled fairly and confidentially in accordance with the Schools Complaints Procedure.

20 Retention, Security of Records and Data Protection Obligations

- 20.1 All recruitment documentation for successful candidates is retained on the personnel file in line with the Data Retention Policy.
- 20.2 Application forms and interview notes for unsuccessful candidates are retained for six months before secure destruction.
- 20.3 DBS certificates are not retained; only the disclosure number and issue date are recorded.
- 20.4 All data is processed in accordance with the DBS Code of Practice and the UK GDPR.



Appendix 2: Recruitment of Ex-Offenders Policy and Procedure

1. Purpose

- 1.1 The safeguarding of children is of paramount importance to St Christopher School (“the School”). The scrutiny of any unspent cautions or convictions, and those which would not be protected under the Ministry of Justice filtering rules, is an essential and non-negotiable part of our pre-employment checking process.
- 1.2 This Policy outlines the School’s approach to employing individuals who have criminal convictions. We are committed to equality of opportunity for all job applicants and will not unfairly discriminate against any candidate for employment on the basis of conviction or other information revealed.
- 1.3 This Policy does not form part of an employee’s contract of employment and may be amended or withdrawn at any time.

2. Statutory Guidance

This Policy has been developed in line with the following legislation:

- 2.1 Disclosure and Barring Service (DBS) Code of Practice
- 2.2 Keeping Children Safe in Education (KCSIE)
- 2.3 Data Protection Act 2018 *and* UK GDPR
- 2.4 Rehabilitation of Offenders Act 1974 (*and* Exceptions Order 1975)
- 2.5 Police, Crime, Sentencing and Courts Act 2022
- 2.6 Disqualification under the Childcare Act 2006 (*July 2018 statutory guidance*)

3. Key Principles:

- 3.1 The School makes appointment decisions based on merit, suitability, and ability.
- 3.2 Having a criminal record will not automatically bar an individual from employment.
- 3.3 Each case will be considered on its own merits using the objective assessment criteria below.
- 3.4 Providing false or misleading information is an offence and may result in rejection of the application, withdrawal of an offer, or summary dismissal if already employed, as well as potential referral to the Police and/or DBS.
- 3.5 Under the relevant legislation, it is unlawful for the School to:
 - 3.5.1 Employ anyone included on the DBS barred lists of individuals unsuitable to work with children.
 - 3.5.2 Employ anyone subject to a disqualifying order relating to offences such as murder, manslaughter, rape, serious sexual offences, grievous bodily harm, or other serious acts of violence.
 - 3.5.3 Employ anyone knowingly disqualified from providing childcare under the Childcare Act 2006.
- 3.6 It is a criminal offence for a disqualified person to apply for a position within the School. The School will report the matter to the Police and/or DBS if:
 - 3.6.1 It receives an application from a disqualified person;
 - 3.6.2 False information is provided in support of an application; or
 - 3.6.3 Serious concerns arise about an applicant’s suitability to work with children.



4. Assessing Disclosures

When a disclosure reveals information about previous convictions or other relevant matters, the School will consider:

- 4.1 The relevance of the offence to the position applied for;
- 4.2 The seriousness of the offence;
- 4.3 The time elapsed since the offence occurred;
- 4.4 Whether there is a pattern of offending or concerning behaviour;
- 4.5 Whether the applicant's circumstances have changed since the offence;
- 4.6 Whether the applicant has, or is able to obtain, an Ofsted waiver (where applicable); and
- 4.7 The explanation provided by the applicant and the surrounding circumstances.

5. High-Risk Roles

- 5.1 For roles involving regular contact with children, it is normally considered high risk to employ anyone with convictions for:
murder, manslaughter, rape, serious sexual offences, grievous bodily harm, serious class A drug offences, robbery, burglary, theft, deception, or fraud.
- 5.2 For roles involving financial or budgetary responsibility, convictions for robbery, burglary, theft, deception, or fraud are considered high risk.
- 5.3 For roles involving driving duties, convictions for drink-driving are considered high risk.

6. Roles and responsibilities

- 6.1 The People Team and/or Head's PA work in partnership with hiring managers to ensure compliance and fairness throughout the recruitment process.
- 6.3 All shortlisted candidates are required to complete a self-declaration form prior to interview.
- 6.4 The Director of People, Designated Safeguarding Lead, and/or Head will review and discuss disclosures with the applicant where relevant, assessing suitability based on the nature and context of any offences.
- 6.5 Where appropriate, specialist legal or HR advice will be sought before a final decision is made.
- 6.5 All information disclosed is treated in the strictest confidence and handled in accordance with the Data Protection Act 2018 and DBS Code of Practice.

7. Relevant Policies and Guidance

- 7.1 Recruitment, Selection and Disclosure Policy
- 7.2 Child Protection Policy
- 7.3 Equal Opportunities Policy – Staff
- 7.4 Data Protection Policy

8. Additional Guidance and Resources

- 8.1 Detailed information, fact sheets and FAQs:
<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>
- 8.2 Filtering guidance from 28/11/20:
<https://www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide>



Ministry of Justice – guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975 (and self disclosure) <https://www.gov.uk/government/publications/new-guidance-on-the-rehabilitation-of-offenders-act-1974>

National Association for the Care and Resettlement of Offenders (Nacro)
Criminal record support service – advice for applicants and employers
<https://www.nacro.org.uk/criminal-record-support-service/>

Filtering flowchart [Filterin-flowchart-twitter.png \(5000×2813\) \(netdna-ssl.com\)](#)