

Safer Recruitment Policy

Reviewed by: Head/Bursar, September 2026
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1 Introduction

- 1.1 The Godolphin and Latymer School is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff. The School recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.
- 1.2 The aims of the School's Safer Recruitment Policy are as follows:
- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
 - to ensure that all job applicants are considered equally and consistently;
 - to ensure that no job applicant is treated unfairly on any grounds, including race, religion or belief, sex or sexual orientation, marriage or civil partnership, pregnancy or maternity, gender reassignment, disability or age (Protected Characteristics);
 - to ensure compliance with all relevant legislation, recommendations and guidance including the Equality Act 2010, Education (Independent School Standards) Regulations 2014 (ISSRs), the statutory guidance published by the Department for Education (DfE) *Keeping Children Safe in Education*, September 2026 (KCSIE), *Disqualification under the Childcare Act 2006* (DUCA), the Prevent Duty Guidance for England and Wales (2023) (the Prevent duty guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
 - to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.
- 1.3 Employees involved in the recruitment and of staff are responsible for familiarising themselves with and complying with the provisions of this policy. They will receive appropriate safer recruitment training which covers, as a minimum, the content of Part Three of KCSIE.

2 Data Protection

- 2.1 The School is legally required to carry out pre-appointment checks detailed in this procedure and carries out other checks in accordance with KCSIE and for the purpose of assessing an applicant's suitability for the role. Staff and prospective staff will be required to provide certain information to the School to enable the School to carry out the checks that are applicable to their role. The School may also provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency, where this is necessary and lawful. Failure to provide requested information may result in the School not being able to meet its employment, safeguarding or legal obligations. or to progress an application or appointment.
- 2.2 The School will process personal information in accordance with the UK GDPR, the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, and its Safer Recruitment Privacy Notice (see Appendix 4) and, where applicable, its Staff Privacy Notice. The School will collect only information that is relevant and necessary for the recruitment process and applicable safeguarding checks. Information will be used only for the purposes for which it was collected, kept securely, made available only to those who need it and retained in accordance with the School's Information and Records

Retention Policy. The School will also comply with the additional legal requirements applying to special category data and criminal offence data.

3 Recruitment and Selection Procedure

- 3.1 All applicants for employment will be required to complete an **application form** containing questions about their academic and employment history, including education, employment and voluntary work since leaving school, reasons for leaving their current or most recent employment, reasons for any gaps and their suitability for the role. Applicants will also be asked to provide details of any publicly accessible online profile, including relevant account names and social media handles, to help the School identify the correct profiles when carrying out online searches on shortlisted applicants (see section 8 below). Applicants will not be required to provide passwords, disclose private account content or give the School access to information that is not publicly available.
- 3.2 Incomplete application forms will be returned to the applicant where the application deadline has not passed. Should there be any gaps in academic or employment history, a satisfactory explanation must be provided. A curriculum vitae will not be accepted in place of the completed application form, although it may be submitted alongside it.
- 3.3 Applicants will receive a job description for the role applied for. Application forms, job descriptions, this policy and the School's Safeguarding (Child Protection) policy and procedures are available to download from the School's website. Where a role involves regulated activity with children, the application form or accompanying information will make clear that it is an offence for a person who is barred from regulated activity with children to apply for the role.
- 3.4 The School will then conduct a shortlisting exercise by reviewing all application forms received in order to determine which applicants will be invited for interview. The shortlisting exercise will be conducted by at least two members of staff who will also ideally be involved in the interview process. The shortlisting exercise will identify and consider any inconsistencies, gaps in employment and reasons given for them, and any other potential concerns.
- 3.5 Shortlisted applicants will be invited to attend a **formal interview** at which their relevant skills and experience will be discussed in more detail (see Appendix 3 for more details). All shortlisted applicants will be assessed at interview on their suitability to work with children. The interview will also explore their motivation for working with children, any gaps or frequent changes in employment and any concerns arising from their application, references, self-declaration or online search. The information considered and the reasons for the appointment decision will be recorded.
- 3.6 All shortlisted applicants will be required to complete a self-declaration form prior to interview in which they will be asked to provide information about their criminal record, subject to the applicable disclosure and filtering rules, and other factors relevant to their suitability to work with children. This may include whether they are barred from regulated activity with children, prohibited from teaching or participating in the management of an independent school, disqualified from providing relevant childcare or subject to relevant overseas restrictions. This information will be considered and discussed with applicants at interview. Applicants will be asked to confirm that the information they have provided is true.
- 3.7 If the School decides to make an offer of employment following the **formal interview**, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment;
- verification of the applicant's identity (where that has not previously been verified);
- verification of qualifications which the School deems a requirement for the post, or which the applicant otherwise cites in support of their application, and which the School takes into account in making the appointment decision, including verification through the DfE's Check a teacher's record service of QTS and the completion of induction or probation, where applicable;
- verification of the applicant's employment history;
- the School being satisfied that any information generated through online searches does not make the applicant unsuitable to work at the School;
- the receipt of two references (one of which must be from the applicant's current or most recent employer) which the School considers to be satisfactory;
- for positions which involve 'teaching work', confirmation that the applicant is not subject to a teacher prohibition or interim prohibition order, or any current sanction or restriction imposed by the former General Teaching Council for England;
- for applicants who have carried out teaching work outside the UK, such checks as the School considers appropriate, which may include obtaining information from the relevant professional regulating authority about any sanction or restriction and whether it is aware of any reason why the applicant may be unsuitable to teach;
- receipt of the appropriate level of DBS certificate which the School considers satisfactory and, where the position amounts to regulated activity with children (see section 9 below), confirmation that the applicant is not included on the Children's Barred List¹;
- for management positions, confirmation that the applicant is not subject to or is the subject of a direction under section 128 of the Education and Skills Act 2008, which renders them unable to take up the relevant management position at the School;
- confirmation that the applicant is not disqualified from acting as a trustee / governor or senior manager of a charity under the Charities Act 2011 (if applicable, see section 12 below);
- verification of the applicant's mental and physical fitness for the role (see section 13 below);
- verification of the applicant's right to work in the UK; and
- any further checks which the School decides are necessary as a result of the applicant having lived or worked outside the UK, which may include an overseas criminal records check, certificate of good conduct, information from a relevant professional regulating authority or professional references.

¹ The School may obtain Children's Barred List information only where the individual will engage in regulated activity with children. An enhanced DBS check without barred-list information may be obtained for other roles where the individual is eligible for that level of check. The School will determine whether each role amounts to regulated activity and obtain the appropriate check. For these purposes, regulated activity includes teaching, training, instructing, caring for or supervising children where this is carried out frequently, on more than three days in a 30-day period or overnight, as well as relevant personal care and healthcare which is regulated activity regardless of frequency. Where an individual is permitted to start regulated activity before their DBS certificate is available, the School will obtain a separate Children's Barred List check and put appropriate supervision and other safeguards in place. Different arrangements apply to agency and third-party staff, for whom the School will obtain written confirmation that the required checks have been completed.

4 Artificial Intelligence

- 4.1 The School does not use artificial intelligence or automated decision-making to sift, score, rank or shortlist applicants, or to determine or materially influence any recruitment or promotion decision, including in respect of external and internal applications and promotion proposals. All such decisions will be made by appropriately trained members of staff. Any use of artificial intelligence for administrative purposes must comply with the School's Data Protection Policy and must not involve entering applicants' personal information into an AI tool unless expressly permitted under those policies.

5 Pre-employment checks

- 5.1 In accordance with the recommendations set out in KCSIE and the requirements of the ISSRs, the School carries out all mandatory and recommended pre-appointment checks applicable to the role and prospective staff, as set out in this policy.
- 5.2 In fulfilling its obligations to carry out pre-appointment checks, the School does not discriminate on the grounds of any Protected Characteristic. Checks will be undertaken consistently and only to the extent that they are relevant and necessary for the role.
- 5.3 For unsuccessful candidates, the School retains any relevant information identified through online searches and used as part of the recruitment decision for six months from the date on which they are informed their application was unsuccessful, after which it will be securely destroyed, unless it is necessary to retain it for longer in connection with a legal claim or another legal obligation. Where possible, the School will retain a record of the relevant findings rather than copies of the underlying material obtained through the online search. Information which is not relevant to the recruitment process will not be recorded or retained.

6 Verification of identity, address, right to work in the UK and qualifications

- 6.1 All applicants who are invited to an interview will be required to provide or enable the School to access evidence of their identity, right to work in the UK, address and qualifications. The School asks for this information at interview to ensure that the person attending the interview is who they claim to be, that they are permitted to work for the School if appointed and that they hold appropriate qualifications.
- 6.2 **Identity:** The School will verify the applicant's identity manually in accordance with the current DBS identity-checking guidelines. Applicants must provide the original documents required under the applicable DBS document route. The documents currently accepted for identity checks are listed at Appendix 1:
- one document from Group 1²; and
 - two further documents from either of Group 1, Group 2a or Group 2b.
- 6.3 Where an applicant has changed their name by deed poll or any other means (e.g. marriage, adoption or statutory declaration) they will be required to provide documentary evidence of the change and details of all previous names. They will also be asked to provide their birth certificate.

² KCSIE states that, where a birth certificate is available, it is best practice to check the name on the birth certificate against the other identity documents provided.

- 6.4 The School asks for the date of birth of all applicants in order to verify identity and check for any unexplained discrepancies in the employment and education history. The School does not discriminate on the grounds of age, and this information will not be used to determine whether an applicant should be shortlisted.
- 6.5 **Address:** Applicants must provide their current address on the School's application form. Applicants invited to interview must also provide an original document confirming their current address. Any discrepancy between the address provided on the application form and the supporting document will be followed up with the applicant.
- 6.6 **Right to work in the UK:** all applicants must also bring to interview a valid form of evidence which confirms their right to work in the UK. The School will carry out the appropriate manual, online or digital right-to-work check in accordance with current Home Office guidance. Applicants with an eVisa will normally provide a share code so that the School can use the Home Office online service. Biometric residence permits and biometric residence cards will not be accepted as evidence of a right to work.
- 6.7 The School will check evidence an applicant's right to work in the UK in accordance with the Home Office '**Code of Practice on preventing illegal working: Right to Work Scheme for employers**', (updated June 2026), the current employer's guide to right-to-work checks and the Code of Practice on avoiding unlawful discrimination while preventing illegal working
- 6.8 **Qualifications:** all applicants must also bring to interview original documents which evidence any educational and professional qualifications referred to in their application form and/or which the School requests. Where applicable, the School will use the DfE's Check a teacher's record service to verify the award of qualified teacher status and the completion of teacher induction or probation.
- 6.9 **Retention of records:** the School will retain copies of the documents used to verify candidates' identity and qualifications only where necessary and in accordance with the Information and Records Retention Policy. For a successful applicant, evidence of the right-to-work check will be retained securely for the duration of their employment and for two years after their employment ends, in accordance with Home Office requirements. Information relating to unsuccessful applicants will be retained in accordance with the Safer Recruitment Privacy Notice.

7 References

- 7.1 References will be taken up on shortlisted applicants prior to interview where possible. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.
- 7.2 All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the School. One of the references must be from the applicant's current employer. Where the applicant is not currently employed, the School will obtain verification of their most recent relevant period of employment. If the current/most recent employment does/did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend.
- 7.3 All referees will be asked whether they are satisfied that the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the

applicant is unsuitable to work with children. All referees will be sent a copy of the job description and person specification for the role for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title/duties, reason for leaving, performance, sickness absence record³ and any disciplinary record relevant to the role;
- the facts, rather than opinions, of any substantiated safeguarding concerns or allegations that meet the harm threshold⁴; and
- any low-level concerns that relate to misconduct or poor performance which would normally be included in a reference.

- 7.4 The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials.
- 7.5 The School will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed. The School will also establish the reason for the applicant leaving their current or most recent post.
- 7.6 If it has not been possible to obtain a reference prior to interview it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and/or the interview assessment form will be considered by the School. The applicant may be asked to provide further information or clarification before an appointment can be confirmed. Any concerns must be resolved satisfactorily before the appointment is confirmed.
- 7.7 If factual references are received, i.e. those which contain limited information such as job title and dates of employment, this will not necessarily disadvantage an applicant although additional references may be sought and the referee may be contacted for clarification before an appointment can be confirmed.
- 7.8 The School will verify that a reference originates from a legitimate source. The School will contact the referee where necessary to verify or clarify the information provided, particularly where the reference is vague or insufficient.
- 7.9 The School treats all references given or received as confidential, subject to applicable data protection law, which means that the applicant will not usually be provided with a copy.
- 7.10 All references received from a school must be completed by a senior person with appropriate authority and confirmed by the Head of that school as accurate in respect of any disciplinary investigations.

³ Questions about sickness absence will only be included in reference requests sent after a conditional offer of employment has been made. Any information received will be considered in accordance with the Equality Act 2010 and will not be used to discriminate unlawfully.

⁴ References will not include concerns or allegations which were found to be unsubstantiated, unfounded, false or malicious. Repeated concerns or allegations which were all found to fall within these categories will also not be included.

- 7.11 All internal candidates who apply for a new role at the School will have their application assessed in accordance with this procedure. Any concerns must be considered and resolved before the appointment is confirmed.

8 Online Searches

- 8.1 In addition to the checks set out below, the School may obtain proportionate background information that is publicly available and relevant to determine whether an applicant is suitable to work at the School. In accordance with KCSIE this will include online searches on shortlisted candidates (online searches). The online searches may include searches of internet search engines, websites, social media platforms and professional networking sites. Shortlisted applicants will be informed that online searches may be undertaken as part of the School's due diligence checks. Applicants are not required to provide account passwords or to grant the School access to social media or professional networking account content that is not publicly available. The School will not use a false identity, attempt to gain access to private content or require an applicant to accept a connection request.
- 8.2 Online searches will normally be carried out as part of the shortlisting stage and before interview, so that any relevant matters can be discussed with the applicant. Where this has not been possible, a search may be completed after a conditional offer has been made, but before the applicant starts work. The School will not carry out online searches as part of its initial sift of applications.
- 8.3 The School will determine how it approaches online searches having regard to the role and the nature of the applicant's proposed duties. However, all applicants for the same role will be treated consistently with regard to online searches, unless there is an objective and recorded reason for taking a different approach.
- 8.4 Wherever possible, online searches will be undertaken by a person who will play no other part in the recruitment process (including the shortlisting exercise) or the appointment decision. In carrying out online searches the School will identify only publicly available information about an applicant that:
- may be relevant to their suitability to carry out the role for which they have applied;
 - may be relevant to their suitability to work at the School or in an education setting;
 - is of a safeguarding nature. or
 - may reasonably be expected to adversely affect the School's reputation⁵.
- 8.5 Relevant information generated from online searches will be entered in an 'Online Search Results Record'. Information which is not relevant to the recruitment decision will not be recorded or shared with the recruitment panel. Where online searches are undertaken on shortlisted applicants, any relevant information generated will be provided to the interview panel for discussion with shortlisted applicants at interview. Where online searches are undertaken on the successful applicant only, any relevant information generated will be discussed with the applicant prior to employment commencing. All

⁵ Only relevant information will be provided to the recruitment panel. Information about a Protected Characteristic or other personal information that is irrelevant to the applicant's suitability will not be provided.

offers of employment will be conditional upon the School being satisfied that the successful applicant is suitable to work at the School in light of any relevant information generated from online searches. The applicant will be given a reasonable opportunity to respond to any information which may adversely affect the appointment decision.

8.6 In evaluating any online information for relevance, accuracy and fairness, the School will use the following criteria:

- whether the information can reliably be attributed to the applicant;
- whether the information is accurate and relevant to the position applied for;
- whether the information is relevant to the applicant's suitability to work at the School or in an education setting;
- whether the information calls into doubt the applicant's willingness or ability to uphold the School's commitment to safeguarding and promoting the welfare of children;
- the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published;
- the context in which the information was published and the reliability of its source;
- whether the information reveals a pattern of concerning behaviour; and
- the relevant circumstances and the explanation(s) offered by the applicant⁶.

8.7 For successful candidates, the School will retain only relevant information generated through online searches which was used as part of the recruitment decision and in accordance with its Record Keeping and Retention Policy and the Recruitment Privacy Notice. Irrelevant information will not be recorded and will be securely deleted.

9 Criminal Records Checks

9.1 The School will obtain the appropriate level of DBS check for each role in accordance with applicable legislation and statutory guidance. Where an enhanced DBS check is obtained, the certificate may also contain relevant information held by local police.

DBS Filtering Rules

9.2 Filtering is the process used by the DBS to determine which criminal record information will be disclosed on a standard or enhanced DBS certificate. Certain convictions and cautions are protected under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended, and will not normally be disclosed.

9.3 The School will only ask applicants to disclose convictions and cautions which it is legally entitled to ask about and consider. Applicants are not required to disclose protected convictions or cautions. If protected information is disclosed, the School will not take it into account.

⁶ The School will not take account of information which is irrelevant to the recruitment decision, including information revealing a Protected Characteristic, lawful trade-union activity or lawful political or religious beliefs.

9.4 Standard and enhanced DBS certificates will disclose all unspent conditional cautions and convictions. They will also disclose certain spent convictions and cautions, including:

- convictions for specified offences;
- adult cautions for specified offences; and
- convictions which resulted in a custodial sentence, including a suspended custodial sentence.

Other convictions and cautions will be disclosed or filtered in accordance with the applicable **DBS filtering rules**. An enhanced DBS certificate may also include information held by the police which a chief officer reasonably believes to be relevant to the role and considers ought to be disclosed.

9.5 The School will consider any criminal record information disclosed fairly and on an individual basis. The School will take account of:

- the seriousness of any offence and relevance to the post applied for;
- how long ago the offence occurred;
- whether it was a one-off incident or a history of incidents;
- the circumstances around the incident; and
- whether the individual accepted responsibility for their actions⁷.

9.6 The School complies with the DBS Code of Practice and is committed to treating applicants fairly. Having a criminal record will not automatically prevent an applicant from being appointed. The School will consider any criminal record information disclosed in light of the requirements of the role and the circumstances of the individual case.

Regulated Activity

9.7 The School will obtain an enhanced DBS check with Children's Barred List information in respect of all positions at the School which amount to 'regulated activity' as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an enhanced check with Children's Barred List information is to identify whether an applicant is barred from working with children and to obtain other relevant suitability information. Subject to the applicable frequency conditions below⁸, regulated activity includes:

- paid or unpaid work involving teaching, training, instructing, caring for or supervising children;
- providing advice or guidance to children about their physical, emotional or educational wellbeing;
- driving a vehicle provided only for children; and
- other paid work carried out in the School which provides an opportunity for contact with children.

⁷ Where the applicant is applying for a teaching post, the School will also consider the matter in the context of the Teachers' Standards and the applicable teacher misconduct guidance. Any decision not to appoint because of criminal record information will be clearly recorded, together with the reasons for the decision.

⁸ The frequency conditions are met where the work is carried out frequently, on more than three days in a 30-day period or overnight. Relevant personal care, and healthcare provided by or under the direction or supervision of a regulated healthcare professional, are always regulated activity, regardless of how often they are carried out.

- 9.8 Roles which are carried out on an unpaid/voluntary basis amount to regulated activity where the applicable activity and frequency conditions are met. From 1 September 2026, supervision does not prevent a volunteer's teaching, training, instructing, caring for or supervising children from being regulated activity where the applicable frequency or overnight condition is met..
- 9.9 It is for the School to decide whether a role amounts to 'regulated activity' taking into account all the relevant circumstances. However, nearly all posts at the School amount to regulated activity. Limited exceptions could include an administrative post undertaken on a temporary basis in the School office outside of term time or voluntary roles which do not meet the applicable activity and frequency conditions. Where a voluntary role does not amount to regulated activity, the School will complete a written risk assessment to determine what checks are appropriate. Barred List information will not be requested for a person who is not engaging, or seeking to engage, in regulated activity.

The DBS Disclosure Certificate

- 9.10 The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to the School. It is a condition of employment with the School that the **original** disclosure certificate is shown to the School before the applicant takes up their post or, where the School has authorised an exception under paragraph 9.11, as soon as practicable after the individual's appointment. Original certificates should not be sent by post. A convenient time and date for bringing the certificate into the School should be arranged with the School's Head of HR as soon as it has been received. The School must see the original paper certificate and will verify its authenticity in accordance with DBS guidance. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School. Any information disclosed on the certificate will be considered fairly and on a case-by-case basis in accordance with paragraph 9.4.

Starting work pending receipt of the DBS disclosure

- 9.11 If there is a delay in receiving a DBS disclosure, the Head (teaching staff) and Bursar (support staff) have the discretion to allow an individual to begin work pending receipt of the disclosure certificate. This will only be allowed if all other relevant pre-appointment checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and the School has completed and recorded a risk assessment and put appropriate supervision has been put in place. The supervision arrangements and risk assessment will be reviewed regularly until the original DBS certificate has been seen and considered satisfactory.

Applicants with periods of overseas residence

- 9.12 DBS checks will still be requested for applicants with periods of overseas residence and those with little or no previous UK residence. The School will take into account the 'DBS unusual addresses guide' in such circumstances.
- 9.13 Applicants who have lived or worked outside the UK will undergo the same checks as other applicants, including an enhanced DBS check with Children's Barred List information where they will engage in regulated activity. A DBS check does not, by itself, establish whether relevant events occurred outside the UK.
- 9.14 For applicants who are living overseas, or who have lived or worked overseas previously, obtaining a DBS certificate may be insufficient to establish their suitability to work at the School. The School will consider what further checks are appropriate in each case. The

School's policy is to request such information from each overseas country in which the applicant has lived or worked for a period of three months or more in the previous ten years. The School may also request checks relating to shorter or earlier periods where it considers this appropriate.

- 9.15 When requesting such information, the School will have regard to relevant government guidance and may require the applicant to apply for a formal check from the country in question, where such a check is available and the School considers it appropriate, i.e. a criminal records check (or equivalent) or a certificate of good conduct.
- 9.16 The School recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances, the School will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country. Where the relevant information is unavailable, the School will use alternative methods of checking the applicant's suitability and/or undertake a risk assessment to support an informed decision about whether to proceed with the appointment.
- 9.17 In addition, where an applicant for a teaching position has worked as a teacher outside of the UK, the School will ask the applicant to obtain from the professional regulating authority of the teaching profession in each relevant country evidence confirming whether it has imposed any sanctions or restrictions on the applicant and/or is aware of any reason why the applicant may be unsuitable to teach. The School will also ask shortlisted applicants (and their referees) to disclose whether they have ever been the subject of a sanction or restriction issued by, the regulator of the teaching profession in the countries in which they have carried out teaching work.
- 9.18 Sanctions and restrictions issued by the regulating authority of another country will not automatically prevent a person from working as a teacher at the School. However, the School will take the circumstances that led to any sanction or restriction, together with all other relevant information into account in determining whether an applicant is suitable to work at the School.
- 9.19 The School will ensure that any overseas checks it considers necessary, or appropriate alternative checks and/or a risk assessment where the relevant information is unavailable, are completed before the appointment is confirmed. A reference or letter of professional standing may form part of that assessment but will not automatically be sufficient on its own.
- 9.20 If no information is available from a particular country the School will use alternative methods of checking the applicant's suitability and/or undertake a risk assessment. The appointment will only be confirmed if the School has sufficient information to make an informed decision that the applicant is suitable.
- 9.21 The School will take proportionate risk-based decisions on a person's suitability in these circumstances. All suitability assessments must be documented and retained on file, including the evidence considered, the decision reached and the reasons for that decision.
- 9.22 If the formal check is delayed and the School is not satisfied about the applicant's suitability in the absence of that information, the applicant's proposed start date will be delayed until the formal check is received or appropriate alternative checks and/or a risk assessment have been completed and the School is satisfied as to the applicant's suitability.

10 Prohibition from teaching check

- 10.1 The School is required to check whether staff who carry out teaching work' are prohibited from doing so. The School uses the DfE's "Check a teacher's record" service to check whether successful applicants are the subject of a prohibition order or interim prohibition order issued by the Secretary of State. The School will also check for any sanction or restriction imposed by the former General Teaching Council for England which remains current. A person subject to a prohibition order or interim prohibition order will not be appointed to carry out teaching work.
- 10.2 In addition, the School asks all shortlisted applicants to declare whether they have ever been subject to any sanction, restriction, prohibition order or interim prohibition order affecting their ability to teach.
- 10.3 Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the Teaching Regulation Agency (or other equivalent body), whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.
- 10.4 The School applies the definition of 'teaching work' set out in the Teachers' Disciplinary (England) Regulations 2012 which states that the following activities amount to 'teaching work':
- planning and preparing lessons and courses for pupils;
 - delivering lessons to pupils;
 - assessing the development, progress and attainment of pupils; and
 - reporting on the development, progress and attainment of pupils.
- 10.5 The above activities do not amount to 'teaching work' if they are carried out under the direction and supervision by a qualified teacher or other person nominated by the Head. If in any doubt, or if the applicant has taught previously, or may teach in future, the check will be undertaken, including for sports coaches.

11 Prohibition from management check

- 11.1 The School is required to check whether any applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent school (**section 128 direction**). A person subject to a section 128 direction must not be appointed to a role or governing body position covered by that direction.
- 11.2 The School will carry out checks for section 128 directions when appointing applicants into management positions from both outside the School and by internal promotion.
- 11.3 The check applies to roles which involve, or are likely to involve, taking part in the management of the School. These include, but are not limited to:
- the Head;
 - members of the senior leadership team; and
 - other teaching or support staff roles which carry significant management responsibilities.

- 11.4 The School will assess on a case by case basis whether the check should be carried out when appointments are made to teaching and support roles which carry additional responsibilities. The job title alone will not determine whether the check is required; the School will consider the responsibilities and level of authority attached to the role.
- 11.5 All individuals who are appointed to the governing body will be subject to a section 128 direction check.
- 11.6 The relevant information will be disclosed on an enhanced DBS certificate with children's barred list information where "child workforce independent schools" is specified on the application. Where a person is not eligible for a children's barred list check, or where a separate check is appropriate, the School will carry out a section 128 check using the relevant DfE service or the section 128 information published on [GOV.UK](https://www.gov.uk).
- 11.7 In addition the School asks all shortlisted applicants to declare whether they have ever been the subject of a referral to the Department for Education, or are subject to a section 128 direction or any other sanction which prohibits, disqualifies or restricts them from being involved in the management of an independent school.
- 11.8 Where an applicant is not currently prohibited from management but has been the subject of a referral to, or hearing before, the Department for Education or other appropriate body whether or not that resulted in the imposition of a section 128 direction or other sanction, or where a section 128 direction or other sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.

12 Disqualification from acting as a charity trustee or senior manager

- 12.1 **Background:** Under the Charities Act 2011, it is normally a criminal offence for a person to act as a charity trustee or hold a relevant senior management position while disqualified, subject to limited statutory exceptions. A person who is disqualified must not act in a relevant position unless the disqualification has been waived by the Charity Commission. These include unspent convictions for offences specified in the legislation and a range of other specified circumstances.
- 12.2 **Who is covered:** A person is considered to be a charity trustee if they are one of the people who have general control and management of the administration of the charity. In an independent school, the trustees will typically be the governors of the School. Senior managers include those employees who report directly to the charity trustees or have responsibility for the overall management and control of the charity's finances. At the School the disqualification rules will be applicable to all governors, the Head, Bursar and potentially other senior staff who report directly to the governors.
- 12.3 **Self-declaration:** All those who are covered by the disqualification rules are required to complete a self-declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria. A failure to disclose relevant information, or the provision of false information, which subsequently comes to the School's attention may result in the termination of their appointment as a governor or senior manager or the withdrawal of an offer of employment. All those who are required to complete a self-declaration form are also under an ongoing duty to inform the School if there is a change in their circumstances that results or may result in them becoming disqualified from acting as a governor or senior manager.

12.4 **Checks by the School:** To ensure that it has accurate and up to date information the School will also check the following registers in respect of each governor and senior manager who is already in post or is appointed in future:

- the Individual Insolvency Register;
- the register of disqualified directors maintained by Companies House; and
- the Register of Removed Trustees.

12.5 **Waiver:** A person who discloses that one or more of the disqualification criteria is applicable to them may apply to the Charity Commission for a waiver of the disqualification. A person who is disqualified will not be permitted to act as a governor or relevant senior manager unless and until an applicable waiver has been granted. The School will consider what action is required while any waiver application is being determined. Any decision to withdraw an offer of employment or take action in relation to an appointment or employment will be made in accordance with the School's legal and contractual obligations.

13 Medical fitness

13.1 The School is legally required to ensure that anyone to be appointed to a post at the School is medically fit to undertake the role, **after** an offer of employment has been made but **before** the appointment can be confirmed. It is the School's practice that all applicants to whom an offer of employment is made must complete a Health Questionnaire. This information will be reviewed against the Job Description for the particular role, together with details of any other physical or mental requirements of the role ie, proposed timetable, extra- curricular activities, layout of the School etc. If the School has any doubts about an applicant's fitness the School will consider reasonable adjustments in consultation with the applicant. The School may also seek a further medical opinion from a specialist or request that the applicant undertakes a full medical assessment where this is necessary and with the applicant's consent.

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

13.3 The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn on health or disability grounds without first consulting with the applicant, considering any relevant medical evidence where appropriate and considering reasonable adjustments. The School will also consider whether there is a suitable alternative role where appropriate.

14 Lodestone House Staff, Contractor Staff and Agency Staff

14.1 The School will set out its safeguarding requirements in its contract with the contractor. The School will ensure that contractors and their employees have been subject to the appropriate level of DBS check. Those engaging in regulated activity relating to children must have an enhanced DBS check including children's barred list information. Other contractors whose work provides an opportunity for regular contact with children must have an enhanced DBS check without barred list information. The School requires written confirmation from Lodestone House, and any other contractor, that it has completed the

appropriate checks on all individuals whom it intends to work at the School before any such individual can commence work at the School. No contractor for whom the appropriate checks have not been obtained will be permitted to work unsupervised or engage in regulated activity relating to children.

- 14.2 Agencies who supply staff to the School must complete the pre-employment checks which the School would otherwise complete for its staff. The School requires written confirmation that these checks have been completed before an individual can commence work at the School and that the required enhanced DBS certificate has been obtained. The confirmation must state whether the certificate contains any information. Where it does, the School must obtain a copy of the certificate from the agency. Where a children's barred list check is required, the agency must obtain this before appointing the individual.
- 14.3 The School will independently verify the identity of individuals supplied by contractors or an agency on their arrival at the School, in accordance with section 6.2 above.
- 14.4 Where an individual working at the School is self-employed, the School will either obtain the appropriate DBS check or, where the individual has obtained their own check, request to see the DBS certificate and ensure that the check is at the level required for the role.

15 Volunteers

- 15.1 The School will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of the School (the definition of regulated activity set out in section 9.5 above will be applied to all volunteers).
- 15.2 The School will request an enhanced DBS disclosure without Children's Barred List information on volunteers who do not undertake regulated activity but whose roles would amount to regulated activity if carried out frequently enough. This is likely to be because their volunteering duties do not meet the applicable frequency or overnight conditions. For any other volunteer who may have access to pupils, the School may request a basic DBS check where it considers this appropriate following a written risk assessment.
- 15.3 Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils or to undertake regulated activity relating to children.
- 15.4 It is the School's policy that checks will be carried out for volunteers who will engage in regulated activity who have had a break in service for 12 weeks or more. Those volunteers who are likely to be involved in activities with the School on a regular basis may be required to sign up to the DBS Update Service, which is free for volunteers, as this permits the School to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.
- 15.5 In addition, when completing the written risk assessment for a volunteer who will not undertake regulated activity, the School will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):
- the nature of the volunteer's work with pupils and the level of contact involved;
 - formal or informal information provided by staff, parents and other volunteers;

- character references from the volunteer's place of work or any other relevant source; and
- an informal safer recruitment interview.

16 Visiting speakers and the Prevent duty

- 16.1 The Prevent duty guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.
- 16.2 The School will not request an enhanced DBS disclosure or Children's Barred List information in respect of any visiting speaker who does not engage in regulated activity at the School or perform any other regular duties for or on behalf of the School.
- 16.3 All visiting speakers will be subject to the School's usual visitors procedure. This will include signing in and out at Reception, the wearing of a visitor's badge at all times and being escorted by a fully vetted member of staff and appropriately supervised while on the School site.

The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School. In doing so, the School will always have regard to its own visitor procedures, the Prevent Duty Guidance and KCSIE. The School will also have regard to its duties concerning political impartiality and the balanced presentation of political issues.

- 16.4 In fulfilling its Prevent duty obligations, the School does not discriminate on the grounds of any Protected Characteristic.

17 Policy on recruitment of ex-offenders

- 17.1 The School will not unfairly discriminate against any applicant for employment on the basis of a conviction or other details disclosed. The School makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record, this will not automatically bar them from employment with the School. Each case will be decided on its merits in accordance with the objective assessment criteria set out below.
- 17.2 Where a post is exempt from the Rehabilitation of Offenders Act 1974, applicants will be required to disclose convictions and cautions which the School is legally entitled to ask about. Applicants are not required to disclose convictions or cautions which are protected under the applicable filtering rules. A failure to disclose a previous conviction or caution which the applicant is legally required to disclose, may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction or caution, may in some circumstances, amount to a criminal offence.
- 17.3 It is unlawful for the School to employ anyone who is barred from working with children in regulated activity. It is a criminal offence for any person who is barred from working with children to apply for a position involving regulated activity relating to children. The School will make a report to the police and/or the DBS if:
- it receives an application from a barred person for a position involving regulated activity;

- is provided with false information in, or in support of, an applicant's application; or
 - it has serious concerns about an applicant's suitability to work with children.
- 17.4 In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will consider the following factors before reaching a recruitment decision:
- whether the conviction or other matter revealed is relevant to the position in question;
 - the seriousness of any offence or other matter revealed;
 - the length of time since the offence or other matter occurred;
 - whether the applicant has a pattern of offending behaviour or other relevant matters;
 - whether the applicant's circumstances have changed since the offending behaviour or other relevant matters;
 - the circumstances surrounding the offence and the explanation(s) offered by the applicant; and
 - whether the applicant has accepted responsibility for their actions.
- 17.5 If the post involves regular contact with children, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:
- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or
 - serious class A drug related offences, robbery, burglary, theft, deception or fraud.
- 17.6 If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.
- 17.7 If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.
- 17.8 In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a DBS check, the School will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Head and the Bursar before a position is offered or confirmed.
- 17.9 If an applicant wishes to dispute any information contained in a DBS certificate, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the School may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

18 Retention and security of disclosure information

- 18.1 The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information. DBS certificates and certificate information will be stored securely, with access limited to those authorised to receive it. Where the School considers it necessary to retain a copy of a DBS certificate, the reason for doing so will be recorded and the copy will not normally be retained for longer than six months. It will then be securely destroyed. The School may retain a record of the fact that the check was carried out, the result and the recruitment decision taken.

19 Whistleblowing and exit interviews

- 19.1 All staff are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the School's policies (including the Whistleblowing Policy, the Safeguarding Policy and the Staff Code of Conduct). All staff receive training so that they understand the School's expectations. Safeguarding children is at the centre of the School's culture and is accordingly considered formally during staff performance development reviews and appraisal, and finally at an exit interview, which is held with all leavers.

20 Referrals to the DBS and Teaching Regulation Agency

- 20.1 This policy is primarily concerned with the promotion and practice of safer recruitment. However, applicants and those working or volunteering at the School should also be aware that the School has legal responsibilities during recruitment and when employment or other work at the School comes to an end. It is a criminal offence for an individual who is barred from regulated activity relevant to children to apply for a position involving such activity. Where an allegation is made, the School will investigate it and gather sufficient information to establish whether it has foundation and whether the DBS referral criteria are met. The School has a legal duty to make a referral to the DBS where:

- an individual has been removed by the School from working in regulated activity (whether paid or unpaid), or would have been removed had they not left and the School believes that they have:
 - (i) engaged in relevant conduct in relation to children and/or adults;
 - (ii) satisfied the harm test in relation to children and/or vulnerable adults; and/or
 - (iii) been cautioned for, or convicted of, a relevant automatic-barring offence, whether with or without the right to make representations.

This duty applies to paid staff and volunteers who were engaged in regulated activity. Any referral will be made as soon as possible after the individual is removed from regulated activity and will include as much relevant information as possible. Removal from regulated activity may include suspension, redeployment to work that is not regulated activity, dismissal, resignation, retirement or redundancy, or, in the case of a volunteer, ceasing to volunteer at the School.

- 20.2 The DBS will consider whether to include the individual in the Children's Barred List and, where relevant, the Adults' Barred List.

- 20.3 In addition, the School is under a duty to consider whether it is appropriate to make a referral to the Secretary of State, through the Teaching Regulation Agency where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher on those grounds, had the teacher not ceased to provide those services). The School may also, at its discretion, make a referral to the TRA where it considers that concerns may amount to serious misconduct, even if the statutory duty to consider a referral has not yet arisen.
- 20.4 The Teaching Regulation Agency will consider whether to impose a prohibition from teaching order.

21 Queries

- 21.1 If an applicant has any queries about how to apply for a post at the School, they should contact the Head of HR.
- 21.2 It is the School's policy not to provide feedback to unsuccessful applicants.

Appendix 1 List of valid identity documents

The documents listed below are based on the DBS identity checking guidelines for standard and enhanced DBS checks. The School requires applicants to provide the following documents for the purposes of its identity checks⁹.

- one document from Group 1; and
- two further documents from either Group 1, Group 2a or Group 2b.

The combination of documents provided must confirm the applicant's name and date of birth. Documents must meet any validity and other requirements specified below.

Group 1: primary identity documents

- Passport – any current and valid passport. A UK passport may be expired by up to six months.
- eVisa – accessed via the 'View and Prove' service. The share code must be an 'immigration status' share code.
- Biometric Residence Permit (BRP) (UK) - a BRP showing Indefinite Leave to Remain, Indefinite Leave to Enter or No Time Limit can be used up to 18 months after its expiry date. BRP holders should be encouraged to create an account and access their eVisa.
- Application Registration Card (ARC) – issued by the Home Office and must be checked against the Home Office Employer Checking Service.
- Current Driving Licence photocard –full or provisional (UK/Isle of Man and Channel Islands).
- Birth Certificate issued within 12 months of birth (UK, Isle of Man & Channel Islands - including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces). Must be the original birth certificate.
- Adoption Certificate (UK & Channel Islands).

Group 2a: trusted government documents

- Current Driving Licence – photocard full or provisional (all countries outside the UK excluding Isle of Man and Channel Islands).
- Current Driving Licence: paper version if issued before March 2000 – full or provisional (UK/Isle of Man and Channel Islands). All information, including the name and address, must be up to date.
- Birth Certificate issued more than 12 months after time of birth (UK, Isle of Man and Channel Islands).
- Marriage/Civil Partnership Certificate (UK and Channel Islands).
- Immigration document, visa or work permit – issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa/permit must relate to the non UK country in which the role is based.
- HM Forces ID Card or HM Armed Forces Veteran Card (UK).
- Firearms Licence (UK, Channel Islands and Isle of Man).

All driving licences must be valid.

⁹ <https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-standard-and-enhanced-dbs-check-applications-from-22-april-2025>

Group 2b: Financial and social history documents

- Mortgage Statement (UK)**
- Bank/Building Society Statement (UK and Channel Islands)*. A print-off of a bank statement that is endorsed with a stamp and signed by the bank is acceptable.
- Bank/Building Society Statement (countries outside the UK)*. The branch must be in the country where the applicant lives and works.
- Bank/Building Society account opening confirmation letter (UK)*
- Credit Card Statement (UK)*
- Financial Statement – eg pension or endowment (UK)**
- P45/P60 Statement (UK & Channel Islands)**. Original only. Cannot be an online document or printed from an online account/PDF.
- Council Tax Statement (UK & Channel Islands)**
- Letter of sponsorship from future UK employment provider (valid only for applicants residing outside the UK at the time of application) - must be valid at the time of application
- Utility Bill (UK) – Not Mobile Telephone bill*. Cannot be printed from an online account.
- Benefit Statement (UK) – eg Child Benefit, State Pension*
- Central or Local Government/ Government Agency/ Local Council giving an entitlement (UK & Channel Islands), e.g. a letter confirming entitlement to Personal Independence Payment (PIP), free school meals, Universal Credit or asylum support*
- HMRC self-assessment letter or tax demand letter (UK)**
- European Health Insurance Card (EHIC) or Global Health Insurance Card (GHIC) (UK).
- EEA National ID Card - must be valid at time of application.
- Irish passport card (cannot be used with an Irish passport) - must be valid at time of application.
- Cards carrying the PASS accreditation logo (UK, Isle of Man and Channel Islands) - must be valid at time of the application. Digital PASS cards are acceptable where they have been issued by an approved digital PASS provider and the QR code has been used to confirm the details.
- Letter from Head or College Principal or Apprenticeship Provider (UK) for 16-19 year olds in full time education or on an apprenticeship – only used in exceptional circumstances if other documents cannot be provided - issued with the last month.

Note

If a document in the list of valid identity documents is:

denoted with * - it should be less than three months old

denoted with ** - it should be less than 12 months old

Appendix 2 Advertising Policy

All recruitment exercises must be planned and timetabled to ensure the School recruits the best and most suitable staff.

Prior to the commencement of any recruitment exercise a job description must be prepared for the vacant role. This will confirm that there is a genuine need for recruitment and will assist the School in ensuring that the most appropriate candidate is recruited for the role. The job description must clearly define the role and include the following information:

- the skills, abilities, experience, attitude, and behaviours required for the role; and
- the safeguarding requirements of the role (i.e. the extent to which the role will involve contact with and responsibility for children, and whether it will amount to regulated activity with children).

The Head (for teaching positions) and the Bursar (for non-teaching positions) are responsible for all roles that are advertised at the School.

Inappropriate or poorly worded advertisements can give rise to legal claims against the School. Anyone placing an advertisement in breach of this policy will be subject to the School's disciplinary procedure.

Advertising Procedure

Recruitment is carried out by placing advertisements as appropriate on recruitment platforms and/or in other appropriate publications. All advertisements should include:

- brief information about the School;
- details about the position;
- contact details for an application pack; and
- closing date for the receipt of application forms.

All advertisements should include the following wording:

"The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Safeguarding checks will be undertaken as part of the recruitment process.

The safeguarding responsibilities of the post include:

[the advert will list the safeguarding responsibilities of the post as per the job description].

The post is exempt from the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended). Applicants will therefore be required to declare convictions and cautions which they are legally required to disclose. Applicants are not required to disclose convictions or cautions which are protected under the DBS filtering rules."

Application Packs

There are different application forms for Teaching and Non-Teaching posts. In addition to the application form, the following documentation should be available to prospective candidates:

- Job description including background information on the School and department;
- Safeguarding Policy; and
- Safer Recruitment Policy.

Appendix 3 Interview Procedure

Short-listed candidates will be contacted either by post, email or telephone inviting them to attend an interview. They will be advised of the date and time of the interview as well as who the interview will be with and how the event will run. A letter will be sent out confirming the date and time of the interview. Where an application form has been electronically signed, the candidate will be required to physically sign a hard copy of the application form at interview. As well as the required identification documents, applicants will be asked to bring the following documents to the interview if possible:

- documentation confirming their National Insurance Number (P45, P60 or National Insurance Card); and
- original documents confirming any educational and professional qualifications referred to in their application form; and
- an existing DBS disclosure certificate in the applicant's name, should the applicant possess one.

The following information should accompany the interview letter:

- School prospectus (link to the School's website); and
- Job description.

The purpose of the interview is to assess the merits of each candidate against the job requirements and explore their suitability to work with children. The selection process for people who work with children should always include a structured interview even if there is only one candidate.

Candidates should be given a tour of the School and ideally meet all other colleagues in the department, although this can be done informally. Candidates for teaching posts are required to teach a lesson as part of the selection process and non-teaching staff may be required to carry out a practical task.

Interview Panel

The interview panel will always consist of two individuals, one of whom should have undertaken Safer Recruitment training.

Individuals who have undertaken relevant training:

- Frances Ramsey, Head
- Dave Robbins, Bursar
- Jamie Carter, Senior Deputy Head (Academic)
- Michelle Holder, Deputy Head (Pastoral)
- Anna Armstrong, Assistant Head
- John Carroll, Assistant Head
- Jennifer Lloyd, Assistant Head
- Jade Smart, Assistant Head / Designated Safeguarding Lead
- Ellen Elfick, Head of Physical Education
- Christopher Langworthy, Director of Music
- Neil McLaughlan, Governor
- Lorraine Brough, Assistant Bursar (Finance)
- Cheryl Toolan, Head of HR

- Remi Stephenson, Assistant HR Manager

One of the members of the panel should have the necessary authority to make decisions about appointments.

Prior to the interview, the members of the panel should meet to:

- reach a consensus about the required standard for the job;
- consider the issues to be explored with each candidate and who on the panel will ask about each of those and agree the structured questions to be asked; and
- agree their assessment criteria.

Where a candidate is known personally to a member of the selection panel it should be declared before short-listing takes place. It may then be necessary to change the selection panel to ensure that there is no conflict of interest and that equal opportunities principles are adhered to.

Content of the interview

In addition to assessing and evaluating the candidate's suitability for the particular post, the interview panel should also explore:

- the candidate's attitude toward children and young people, including their motivation for working with children;
- their skills and relevant experience of working with children, with examples appropriate to the role
- gaps in the candidate's employment history;
- their understanding of safeguarding and appropriate boundaries between adults and children;
- concerns or discrepancies arising from the information provided by the candidate and/or a referee; and
- any information disclosed in the candidate's criminal record self-declaration or other information which may affect their suitability to work with children.

If, for whatever reason, references are not obtained before the interview, the candidate should also be asked at interview if there is anything they wishes to declare/discuss in light of the questions that have been (or will be) put to their referees. It is vital that the references are obtained and scrutinised before a person's appointment is confirmed and before they start work.

All information considered in making the appointment decision, together with the decision made, should be clearly recorded.

Appendix 4 Safer Recruitment Privacy Notice

Who collects the information

The Godolphin and Latymer School Foundation (the ‘**School**’) is a ‘data controller’ and gathers and uses certain information about you as part of the recruitment process. We will comply with the data protection principles when gathering and using personal information, as set out in our *Data Protection Policy (available on the School website)*.

About the information we collect and hold

The categories of information that we may collect, process and hold for recruitment purposes include:

- your name and contact details (such as home address, telephone numbers and email address);
- previous employment information (such as establishment, post, and salary information and also conduct, grievance or performance issues);
- professional sanctions and/or criminal record information;
- medical information (including information about any reasonable adjustments required during the recruitment process and, where applicable, information collected after an offer has been made to assess fitness for the role);
- details of your referees;
- relevant academic or professional qualifications;
- documents submitted as proof of identity (including proof of your right to work in the UK);
- information about your online presence, including information obtained from publicly available online sources; and
- any notes, including online search results, interview notes and/or lesson observations, recorded as part of the applicant assessment process.

We obtain most of this information directly from you. We may also obtain information from other sources, including your referees, previous employers, publicly available online sources, the Disclosure and Barring Service and other organisations involved in pre-employment checks.

Why we collect and use this information

You are required to provide certain information as part of the recruitment process so that the School can assess your suitability for the role and carry out the checks it is legally required to undertake. If you do not provide the information required, the School may be unable to consider your application or confirm an appointment.

We use information obtained during the recruitment process primarily:

- to comply with our legal obligations governing the recruitment of staff to work in schools (particularly the Education Independent School Standards Regulations (2014), Keeping Children Safe in Education (statutory guidance) and other applicable legal obligations);
- to take steps at your request before entering into an employment contract;

- where necessary for the School's legitimate interests in carrying out a fair recruitment process and assessing your suitability for a role; and
- for successful applicants, to take steps necessary to enter into the employment relationship.

Where we process special category personal data, including health information, we will do so where necessary to meet our obligations and exercise our rights in the field of employment law and/or for reasons of substantial public interest, as permitted by data protection law. Where we process criminal offence data, we will do so where necessary to comply with our legal obligations and for safeguarding purposes, in accordance with the Data Protection Act 2018.

We will only share your personal information where necessary and lawful to do so. This may include sharing information with your referees, the Disclosure and Barring Service, relevant government bodies and other organisations involved in carrying out pre-employment checks or providing recruitment services to the School.

Storage of recruitment information

Successful applicants: recruitment information will be transferred to the individual's HR file and the School's Staff Privacy Notice will apply (available on our website).

Unsuccessful applicants: we retain application data for 6 months after the completion of the process after which it is disposed of securely, either by in-house shredding or by using an accredited confidential waste disposal company, depending on volume.

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Your data protection rights

Depending on the circumstances, you may have the right to request access to your personal information, to require inaccurate information to be corrected, to request the erasure or restriction of processing of your personal information, to object to processing and to request the transfer of certain personal information to you or another organisation. Not all of these rights apply in all circumstances.

If you wish to exercise any of these rights or have any questions about this notice or the School's use of your personal information, please contact the Bursar on DPOfficer@godolphinandlatymer.com.

Further information

If you have a concern about the way the School has handled your personal information, you may make a complaint to the School using the contact details above. If you remain dissatisfied, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK's data protection regulator. Please see the School's Data Protection Policy for further information about your data protection rights and how to raise a concern or complaint.