



SIR WILLIAM BORLASE'S  
GRAMMAR SCHOOL

## Safer Recruitment Policy

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LGB/MET BOARD

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*Inspire  
Empower  
Shape The Future*

## 1. Introduction

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in education. Marlow Education Trust and Sir William Borlase's Grammar School is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, the School expects all staff and volunteers to share this commitment.

## 2. Aims and Objectives

- 2.1.** The aims of the Safer Recruitment policy are to help deter, reject or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.
- 2.2.** The aims of the School's recruitment policy are as follows:
  - 2.2.1.** to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
  - 2.2.2.** to ensure that all job applicants are considered equally and consistently;
  - 2.2.3.** to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;
  - 2.2.4.** to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2022 (KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS)
  - 2.2.5.** 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.
- 2.3.** Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.
- 2.4.** The School has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the



school based on the applicant's abilities, qualification, experience and merit as measured against the job description and person specification.

- 2.5.** The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance (including KCSIE 2022 and Prevent Duty Guidance).
- 2.6.** If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.
- 2.7.** The School aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies at SWBGS.

### **3. Roles and Responsibilities**

- 3.1.** It is the responsibility of the Governing Body to:
  - 3.1.1.** ensure the School has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements and
  - 3.1.2.** monitor the School's compliance with them.
  - 3.1.3.** delegate responsibility for staff appointments to the Headteacher and Senior Leadership Team; School Governors will be involved in senior staff appointments (Head of Department or above) but the final decision will rest with the Headteacher.
  - 3.1.4.** ensure the School always has an DSL/HR Lead responsible for safer recruitment.
- 3.2.** It is the responsibility of the DSL, HR Lead, Senior Leadership Team and other managers involved in recruitment to:
  - 3.2.1.** ensure that the School operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the School
  - 3.2.2.** monitor contractors' and agencies' compliance with this document.



- 3.2.3. promote welfare of children and young people at every stage of the procedure.

#### 4. Definition of Regulated Activity

- 4.1. Any position undertaken at, or on behalf of the School will amount to "regulated activity" if it is carried out:
  - 4.1.1. frequently, meaning once a week or more; or
  - 4.1.2. overnight, or
  - 4.1.3. satisfies the "period condition", meaning four times or more in a 30 day period; and
  - 4.1.4. provides the opportunity for contact with children or
  - 4.1.5. involves the provision of health care or personal care to a child
- 4.2. Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.
- 4.3. The School is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The School is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, the School can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to "regulated activity" must therefore be considered by the School in order to decide which checks are appropriate. It is however likely that in nearly all cases the School will be able to carry out an enhanced DBS check and a Children's Barred List check.

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment procedure. The checklist will be retained on personal files.

#### 5. Recruitment and Selection Procedure

##### 5.1. Advertising

- 5.1.1. To ensure equality of opportunity, the School will advertise all vacant posts to encourage as wide a field of applicants as possible; normally this entails an external advertisement.



- 5.1.2.** Any advertisement will make clear the School's commitment to safeguarding and promoting the welfare of children.
- 5.1.3.** Any advertisement will make clear the skills, abilities, experience and behaviours required for the post, the safeguarding responsibilities of the post and the personal specification
- 5.1.4.** All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA).
- 5.1.5.** Any advertisement will include whether the post is exempt from Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020

## **5.2. Application Forms**

- 5.2.1.** SWBGS uses its own application form and all applicants for employment will be required to complete an application form containing questions about their names, current and previous names, current address and national insurance number, academic and full employment history and reason for leaving current employment and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history). Incomplete application forms will not be shortlisted.
- 5.2.2.** CVs will not be accepted in place of an application form.
- 5.2.3.** It is unlawful for the School to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the School. All applicants will be made aware through the application pack information that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.
- 5.2.4.** Shortlisting will be undertaken by at least two members of the school staff and they will, as far as possible, be part of the interview process to ensure consistency. They will also look for any gaps or inconsistencies in employment history.
- 5.2.5.** The HR Lead or DSL will check applications and follow up any gaps or inconsistencies. Staff reading applications should highlight any concerns to HR/DSL for relevant follow up.
- 5.2.6.** In addition and in line with KCSIE 22 as part of the shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues



that have happened, and are publicly available online, which we might want to explore with the applicant at interview.

- 5.2.7.** If an applicant is shortlisted they will be asked to provide a self declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on [GOV.UK](https://www.gov.uk)
- 5.2.8.** Applicants will be asked to sign a declaration confirming the information they have provided is true. This may be an electronic signature.

### **5.3. Job Descriptions and Person Specifications**

- 5.3.1.** A job description is a key document in the recruitment process, and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role.
- 5.3.2.** The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job. The person specification will include a specific reference to suitability to work with children.

### **5.4. References**

- 5.4.1.** References for shortlisted applicants will be requested immediately after shortlisting. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted at that stage. In such cases, this reference will be taken up immediately after the interview and appointment cannot be confirmed until satisfactory references have been received.
- 5.4.2.** 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 or most recent employer. 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. The referee must not be a relative. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions.
- 5.4.3.** All referees will be asked whether they believe 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. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism".



- 5.4.4.** Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.
- 5.4.5.** Any discrepancies or anomalies will be followed up.
- 5.4.6.** The School does not accept open references or testimonials.

## **5.5. Interviews**

- 5.5.1.** There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).
- 5.5.2.** Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has not been disclosed on the application form.
- 5.5.3.** At least one member of any interviewing panel will have undertaken Safer Recruitment Training or refresher training as applicable. This is in line with the School Staffing (England) Regulations 2009 and the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 which require governing bodies of maintained schools and management committees of pupil referral units (PRUs) to ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- 5.5.4.** All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Original documents only will be accepted and photocopies will be taken. Unsuccessful applicant documents will be destroyed six months after the recruitment programme.
- 5.5.5.** All information considered in decisions making will be clearly recorded along with decisions made
- 5.5.6.** Any student involvement in the recruitment process will be undertaken in a meaningful way. Observing short listed candidates and appropriately supervised interaction with students is common and recognised as good practice.
- 5.5.7.** Interviews with staff members will consist of structured questions which will include



- finding out what attracted the candidate to the post being applied for and their motivation for working with children
- exploring their skills and asking for examples of experience of working with children which are relevant to the role
- probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.

**5.5.8.** Interviews will also be used to explore potential areas of concern to determine the applicant's suitability to work with children. Areas that may be concerning and lead to further probing include:

- lack of recognition and/or understanding of the vulnerability of children
- inappropriate idealisation of children
- inadequate understanding of appropriate boundaries between adults and children
- indicators of negative safeguarding behaviours
- qualified teachers' knowledge of expected safeguarding training

## **6. Offer of Appointment and New Employee Process**

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- 6.1.** the agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment;
- 6.2.** verification of the applicant's identity (where that has not previously been verified). Best practice is to check the name on the birth certificate where this is available; Further identification checks that may be used, can be found on the [GOV.UK](https://www.gov.uk) website
- 6.3.** the receipt of two references (one of which must be from the applicant's most recent employer) which the School considers to be satisfactory;
- 6.4.** for positions which involve "teaching work":
  - 6.4.1.** the School being satisfied that the applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by the National College for Teaching and Leadership, or any predecessor or successor body, or by a regulator of the teaching profession in any other European Economic Area country which prevents the applicant working at the School or which, in the School's opinion, renders the applicant unsuitable to work at the School; and





- 6.4.2.** the School being satisfied that the applicant is not, and has never been, the subject of any proceedings before a professional conduct panel or equivalent body in the UK or any other country for any reason which prevents the applicant working at the School or which, in the School's opinion, renders the applicant unsuitable to work at the School;
- 6.5.** where the position amounts to "regulated activity" the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory
- 6.6.** where the position amounts to "regulated activity" confirmation that the applicant is not named on the Children's Barred List
- 6.7.** confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies or restricts them from providing education at a school, taking part in the management of an independent school or working in a position which involves regular contact with children
- 6.8.** verification of the applicant's right to work in the UK, including EU nationals; any further checks which are necessary as a result of the applicant having lived or worked outside of the UK
- 6.9.** verification of professional qualifications which the School deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified)
- 6.10.** verification of the candidate's mental and physical fitness to carry out their work responsibilities. In line with KCSIE 2022, a job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role
- 6.11.** verification that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State;

## **7. The Rehabilitation of Offenders Act**

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at SWBGS.

## **8. DBS (Disclosure and Barring Service) Certificate (formerly known as CRB Disclosure)**



**8.1.** The School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) 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 for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information.

**8.1.1.** It is the School's policy that the DBS disclosure must be obtained before the commencement of employment of any new employee or volunteer.

**8.1.2.** It is the School's best practice to re-check employee's DBS Certificates at random intervals.

**8.1.3.** Members of staff at SWBGS are aware of their obligation to inform the DSL/HR Department of any cautions or convictions that arise between these checks taking place.

**8.1.4.** DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence.

**8.1.5.** The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. There is a summary from HM Government [here](#).

## **8.2. Portability of DBS Certificates Checks**

**8.2.1.** Staff may wish to join the DBS Update Service if they are likely to require another check in the future. Applicants may sign up to the Service if their check was issued after 17 June 2013, for a fee of £13 per annum, which is payable by the applicant.

**8.2.2.** If staff sign up to the portable service the school will act in accordance with paragraphs 230-233 of KCSIE 2022.

## **8.3. Copies of DBS Checks**

**8.3.1.** The DBS no longer issues Disclosure Certificates to employers, therefore employees/applicants should bring their Certificate to the Human Resources Department (for employees within 7 days of issue or applicants before they commence work or any project involving regulated activity).

## **8.4 Disclosure to Disclosure and Barring Service**

**8.4.1** SWBGS recognises that there is a legal requirement to make a referral to the DBS where an individual has been removed from regulated activity (or would have been removed if they had not left), and they believe the individual has:  
engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been



cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

8.4.2 SWBGS recognises that referrals to the DBS should be made as soon as possible and if an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and there should be sufficient information to meet the referral duty criteria explained in the DBS referral guidance - [GOV.UK](https://www.gov.uk).

## **9. Dealing with Convictions**

**9.1.** The School operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- 9.1.1.** the nature, seriousness and relevance of the offence;
- 9.1.2.** how long ago the offence occurred;
- 9.1.3.** one-off or history of offences;
- 9.1.4.** changes in circumstances,
- 9.1.5.** decriminalisation and remorse.

**9.2.** A formal meeting will take place face-to-face to establish the facts with the Headteacher, Human Resources Lead and Designated Safeguarding Lead. A decision will be made following this meeting. 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, this group will evaluate all of the risk factors above before a position is offered or confirmed.

**9.3.** If an applicant wishes to dispute any information contained in a disclosure, 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.

## **10. Proof of Identity, Right to Work in the UK and Verification of Qualifications and/or Professional Status**

**10.1.** All applicants invited to attend an interview at the School will be required to bring their identification documentation such as passport, birth certificate, driving licence etc. with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS



identity checking guidelines. The School does not discriminate on the grounds of age.

- 10.2.** Where an applicant claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change.
- 10.3.** In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification legally required for the position and claimed in their application form.

## **11. Medical Fitness**

- 11.1.** The School is legally required to verify the medical (physical and mental) fitness of anyone to be appointed to a post at the School, after an offer of employment has been made but before the appointment can be confirmed.
- 11.2.** All applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role.
- 11.3.** The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence and considering reasonable adjustments.

## **12. Overseas checks**

The School, in accordance with the UK Visas and Immigration (UKVI) will, if applicable, sponsor new foreign nationals (see Certificate of Sponsorship section).

In addition, and in line with Bucks Local Authority advice, applicants who have lived/travelled abroad for 6 months or longer in the last 5 years will need to obtain a criminal records check or equivalent from the relevant country, also known as a Certificate of Good Conduct (CGC). The applicant will not be permitted to commence work until the overseas information has been received and is considered satisfactory by the School.

These checks could include, where available:

- Criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK. For teaching positions, obtaining a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) 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 aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Whilst the safeguarding and qualified teacher status (QTS) processes are different it is likely that this information will be obtained from the same place, therefore applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body.

### **13. Certificates of Sponsorship (CoS)**

**13.1.** If an appointed applicant is a national of a non-EEA country, a CoS may be required. Before any offer of employment is made, the Interviewing members of the Senior Leadership Team should consult with the Business Manager/Human Resources Lead to establish whether the School has any unallocated Sponsorship Certificates.

**13.2.** Criteria for issuing a CoS are:

**13.2.1.** The job is in a “designated shortage” occupation, or

**13.2.2.** It passes the Resident Labour Market Test (RLMT)

**13.2.3.** The job is at NQF6 Level or above

**13.2.4.** Minimum salary levels as stated by the UKVI are met.

**13.3.** Only the Human Resources Department will be able to issue a CoS. In addition to the CoS the applicant must apply for entry clearance/leave to remain through the UK Visas and Immigration (UKVI) and comply with the UKVI requirements.

**13.4.** The process can take up to three months and staff cannot, under any circumstances, be employed until permission is given. Detailed advice on the above is available from the Human Resources Department.

### **14. Induction Programme**

All new employees will be given an induction programme which will clearly identify the School policies and procedures, including the Child Protection Policy, the Code of Conduct, Part One of KCSIE 2022, and make clear the expectations which will reflect how staff carry out their roles and responsibilities.

### **15. Single Centralised Record of Staff**

**15.1.** In addition to the various staff records kept in School and on individual personnel files, a single centralised record of recruitment and vetting checks is kept in



accordance with the Education Regulations 2014 requirements. This is kept up-to-date and retained by the Human Resources Lead and can be in electronic or paper format.

**15.2.** The Single Centralised Register will contain details of the following:

**15.2.1.** All employees who are employed to work at the School and the minimum information recorded will be :

an identity check

a barred list check

an enhanced DBS check requested/certificate provided

a prohibition from teaching check

further checks on people who have lived or worked outside the UK

a check of professional qualifications, where required

a check to establish the person's right to work in the United Kingdom.

**15.2.2.** A designated Governor will be responsible for auditing the Single Centralised Register and reporting his/her findings to the full Governing Body.

**15.2.3.** All others who have been chosen by the School to work in regular contact with children. This will cover volunteers, Governors, peripatetic staff and people brought into the School to provide additional teaching or instruction for pupils but who are not staff members eg: sports coaches etc.

**15.2.4.** SWBGS recognises that the trust must require enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees. Academy trusts, including those established to run a free school, have the same responsibilities as all independent schools in relation to requesting enhanced DBS checks for permanent and supply staff. Where an academy trust delegates responsibilities to any delegate or committee (including a local governing body), the trust must require DBS checks on all delegates and all members of such committees. Academy trusts must also check that members are not disqualified from taking part in the management of the school as a result of a section 128 direction

## 16. Record Retention / Data Protection



- 16.1.** The School is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the School will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications.
- 16.2.** Medical information may be used to help the School to discharge its obligations as an employer e.g. so that the School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.
- 16.3.** This documentation will be retained by the School for the duration of the successful applicant's employment with the School. All information retained on employees is kept centrally in the Human Resources Office in a locked and secure cabinet.
- 16.4.** The details of an individual will be removed from the single central record once they no longer work at the school.
- 16.5.** The same policy applies to any suitability information obtained about volunteers involved with School activities.
- 16.6.** SWBGS will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (ie: shredded). The 6-month retention period is in accordance with the Data Protection Act 1998 and GDPR requirements.

## **17. Ongoing Employment**

SWBGS recognises that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. The School will therefore provide ongoing training and support for all staff, as identified through the Annual Review/appraisal procedure.

## **18. Leaving Employment**

- 18.1.** Despite the best efforts to recruit safely there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks the School also has a legal duty to make a referral to the DBS in circumstances where an individual:

- 18.1.1.** has applied for a position at the School despite being barred from working with children; or



**18.1.2.** has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

**18.2.** If the individual referred to the DBS is a teacher, the School may also decide to make a referral to the National College for Teaching and Leadership.

## **19. Contractors and Agency Staff**

**19.1.** Contractors engaged by the School must complete the same checks for their employees that the School is required to complete for its staff. The School requires confirmation that these checks have been completed before employees of the Contractor can commence work at the School.

**19.2.** Agencies who supply staff to the School must also complete the pre-employment checks which the School would otherwise complete for its staff. Again, the School requires confirmation that these checks have been completed before an individual can commence work at the School.

**19.3.** Where SWBGS has obtained an enhanced DBS certificate before the third party staff person is due to begin work at the school or college, which has disclosed any matter or information, or any information was provided to the employment business, the school will obtain a copy of the certificate from the agency.

**19.4.** SWBGS will ensure that any contractor, or any employee of the contractor, who is to work at the school, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information)

**19.5.** For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required by SWBGS

**19.6.** Contractors on whom no checks have been obtained will not be allowed to work unsupervised or engage in regulated activity relating to children on the SWBGS site

**19.7.** The identity of contractors will be verified on arrival at the school

## **20. Visiting Speakers**

**20.1.** 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.





- 20.2.** The School is not permitted to obtain a DBS disclosure or Children's Barred List information on 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.
- 20.3.** All visiting speakers will be subject to the School's usual visitors signing in protocol. This will include signing in and out at Reception, the wearing of a visitors badge at all times, receiving key information on safeguarding and being escorted by a fully vetted member of staff between appointments.
- 20.4.** 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 the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

*"'Extremism' is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces."*

In fulfilling its Prevent Duty obligations the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

- 20.5.** Visitors who attend SWBGS in a professional capacity will be asked to provide an ID check and to assure SWBGS that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks)
- 20.6.** The school recognises that the schools should not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Headteachers will use their professional judgement about the need to escort or supervise such visitors on an event focused basis.

## **21. Volunteers**

- 21.1.** 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 above will be applied to all volunteers).
- 21.2.** Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils.



- 21.3.** It is the School's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the School for six consecutive months 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 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.
- 21.4.** In addition, 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:
- 21.4.1.** formal or informal information provided by staff, parents and other volunteers;
  - 21.4.2.** character references from the volunteer's place of work or any other relevant source; and
  - 21.4.3.** a safer recruitment interview.

## **22. Work Experience**

**22.1** SWBGS recognises that if the school organises work experience placements it should ensure that the placement provider has policies and procedures in place to protect children from harm.

**22.2** SWBGS will consider the specific circumstances of the work experience, particularly to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary.

**22.3** If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, SWBGS will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person

**22.4** SWBGS recognises that schools and colleges are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience

**22.5** If the activity undertaken by a SWBGS student on work experience takes place in a 'specified place', such as a school or sixth form college, and gives the opportunity for contact with children, SWBGS realises this can be considered to be regulated activity relating to children. In these cases, and where the SWBGS student doing the work experience is 16 years of age or over, SWBGS recognises that the work experience provider



e.g. school or sixth form college should consider whether a DBS enhanced check should be requested for the child in question. DBS checks cannot be requested for children under the age of 16

22.6 Where students organise their own work experience independently, a request for leave of absence must be made formally to the headteacher using the school's leave of absence request form. In these cases the parent is acknowledging responsibility for the safeguarding of the child in this independent arrangement and will inform SWBGS of this.

## **23. Alternative Provision**

**23.1.** Where SWBGS places a student with an alternative provision provider, SWBGS continues to be responsible for the safeguarding of that student and should be satisfied that the provider meets the needs of the pupil.

**23.2** SWBGS should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

23.3 Off site activities providers and residential trips.

Where students are attending an off site visit or residential trip, all requests including details of staffing must be included in the Buckinghamshire Council EVOLVE system and approved by the EVC and the Headteacher.

## **24. Ongoing Vigilance**

**24.1.** SWBGS recognises that it is important to create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children. This can assist SWBGS to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing school with information that will help consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in their care.

## **25. Monitoring and Evaluation**

The Human Resources Lead and DSL will be responsible for ensuring that this policy is monitored and evaluated throughout the School. This will be undertaken through formal audits of job vacancies and regular SCR audits by SLT members which will be presented to the Headteacher and Safeguarding Governor to report to the Governing Body.



## Refer To

- [Child Protection and Safeguarding Policy](#)
- [Staff Code of Conduct](#)
- [Keeping Children Safe in Education 2022](#)

