



# CRANFORD

SCHOOL

## Safer Recruitment Policy

This policy forms part of our overarching safeguarding policies and procedures and as such, please also refer to: **‘Whole School Policy and Procedures for Volunteers and Students on Work Experience Placements’, ‘Induction of New Staff and Procedures for ECTs’, ‘Whole School Preventing Radicalisation Policy (Including EYFS)’, ‘Whole School Visiting Speakers’ Policy and Procedures’, ‘Whole School Safeguarding and Child Protection Policy’, ‘Whole School Safeguarding Procedures’ and ‘Equal Opportunities Policy – Staff’.**

### Policy Statement

Cranford School (‘the School’) is committed to safeguarding and promoting the welfare of children and stringent checks are put in place both at interview and before the applicant is accepted to work at the School. This **‘Whole School Safe Recruitment Policy and Procedures’** applies to **all** staff who work at the School, including peripatetic music and drama staff, sports coaches, cleaners, outside providers for clubs etc. and volunteers. The School’s safeguarding policies and procedures\* have regard to the latest version of the DfE statutory guidance: ‘Keeping Children Safe in Education’ (KCSIE) 2024.

This policy is available to all staff in the Cranford School Policies section on the Whole School Staff Team area on Microsoft Teams. It is reviewed annually, and when events or legislation requires, by the Head and Governor with specific responsibility for Safeguarding and Child Protection. The next review date is September 2025.

**This is not a contractual document and may be amended by the School from time to time. All contractual entitlements and obligations are contained in employees’ individual contracts of employment.**

**Any concerns or questions relating to this policy should be addressed to the Head.**

### Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to demonstrate our commitment to safeguarding and promoting the welfare of children.

## **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account
- The skills, abilities, experience, attitude and behaviours required for the post.

## **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- Requires a full employment history, with details of the most recent role first
- Request details of three referees
- Include space for a statement as to why the candidate feels they are suitable for the post
- Include details of qualifications and awarding bodies

Cranford School will not accept CVs in substitution for the school's application forms.

## **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales

- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

### **Seeking references and checking employment history**

Where possible, we will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headmaster/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed
- Ensure that any information about past disciplinary action or allegations is considered very carefully when assessing the applicant's suitability for the post (including information obtained from the Teacher Services' checks).

### **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made
- Ensure that, under section 60 of the 'Equality Act', health-related questions of applicants prior to an offer of employment are specifically only related to an intrinsic function of the work.
- Ensure that the recruitment process is thorough and engages wider staff and pupils (with supervision) from the school, as appropriate to the role

## Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We do not keep a copy of the DBS certificate but do request to see the original certificate as soon as practically possible after it has been issued to the prospective employee. The DBS number is entered into the SCR. In the event information is disclosed on the DBS certificate, Cranford School will follow the recommendations in [KCSIE 2024](#) to consider whether a disclosure will impact a decision not to appoint someone. Where a candidate is subscribed to the DBS update service, a check will be made against this (with the candidate's permission) and the original certificate will be seen.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available (only in exceptional circumstances).
- Verify their mental and physical fitness to carry out their work responsibilities through the completion of a medical form
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment on their personnel file
- Verify their professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service will be used to verify any award of Qualified Teacher Status and the completion of teacher induction or probation
- Ensure they are not subject to a prohibition order if they are employed to be a teacher or teaching assistant
- Follow the NSPCC guidance and apply and carry out additional checks to anyone who has been living or working abroad for three months or more in the last five years.
- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* Management positions are most likely to include, but are not limited to, headmasters, principals and deputy/assistant headmasters.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Please see appendix I, for the full definition of regulated activity, as laid out in Keeping Children Safe in Education 2024.

### **In the Event that a DBS Disclosure is Delayed:**

Cranford School ensures that a separate Barred List Check **must** be undertaken in the event that an Enhanced Disclosure is not received in advance of a member of staff starting work in regulated activity, or where a 'portable' disclosure is used.

In the event of an Enhanced Disclosure being delayed, the School may allow a member of staff to commence work, **for a short period of time**, at the discretion of the Head, after a satisfactory check of the barred list, if the person will be working in regulated activity. In addition to this, the School will ensure that the following is undertaken:

- a satisfactory check of the barred list if the person will be working in regulated activity;
- a full Risk Assessment is in place, signed and reviewed regularly;
- all other relevant checks have been completed satisfactorily;
- ensure that the DBS application has been made in advance;
- ensure appropriate safeguards taken (for example, supervision).

Additional advice is considered good practice:

- avoid confirming the appointment;
- review safeguards at least every two weeks;
- ensure the person in question is informed of the safeguards in place;
- add a note to the single central register and keep evidence of the measures put in place.

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or

- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform and the date confirmation has been received that these checks were undertaken will be entered into the SCR. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## **Governors**

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Due to the fact that the Governors may come onto school site to have lunch with pupils or to conduct learning walks, or for various other reasons whilst pupils are on site, the Governors at Cranford will be subject to a Barred List check as part of the Enhanced DBS.

Cranford School appoints Governors to its Governing Body who are recommended by those known to the School. The school ensures that all Governors undertake mandatory safeguarding training before their appointment to the board and then at regular intervals. Training provides them with the knowledge to ensure the school's safeguarding policies and procedures are effective.

## **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Induction Training:**

- An induction programme for all staff or volunteers newly-appointed in the School will be carried out, to include Health and Safety and Safeguarding (Including Child Protection) training. (See also **'Induction of New Staff Policy and Procedures for ECTSs'** and **'Whole School Safeguarding and Child Protection Policy'** and **'Whole School Safeguarding and Child Protection Procedures'** which are available in the Cranford School Policies section on the Whole School Staff Team area on Microsoft Teams.
- Training and information will also be provided on the School's Policies and Procedures.
- Support will be provided to individuals in a way that is appropriate for the role for which they have been engaged.
- Staff and volunteers will be informed of the conduct expected within the School and any issues or concerns about their roles and responsibilities that they may have will be discussed.
- The person's Line Manager or Head of Department will seek to recognise any concerns or issues about the person's suitability and address them immediately.
- Safeguarding and promoting the welfare of children will be key elements of the Induction Programme.

During Induction **all** staff, including temporary staff and volunteers, are provided with induction training on and copies of the following policy documents\*:

1. **'Staff Code of Conduct'** (which includes the Acceptable Use of IT);
2. **'Whole School Safeguarding and Child Protection Policy'** and **'Whole School Safeguarding and Child Protection Procedures'**;
3. **Part I and Annex A of Keeping Children Safe in Education (September 2024)**
4. **'Whole School Behaviour Policy'**
5. **'Whole School Attendance Policy and Procedures'** which covers the School's procedures for Children Missing Education
6. **'Whistleblowing Policy'**
7. **'Whole School Preventing Radicalisation Policy (Including EYFS)'** and awareness training on the Prevent Duty (Prevent training to be completed.)
8. **'Whole School Missing Pupil Policy and Procedures'**

Staff are required to sign to say they have read and understood the above policies. The Head and/or Senior Assistant Head (Lead DSL) schedule training at INSET or during Whole School Staff Meetings and weekly Staff Briefings to explain any changes to KCSIE which impact our Safeguarding Policy and Procedures and detail how staff must discharge their roles and responsibilities in this area.



Reviewed September 2024: Headmaster, Director of Admissions, Governors  
Review due: September 2025

## Appendix I

### **Regulated activity**

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.

HM Government has produced [Factual note on regulated activity in relation to children: scope](#).

Regulated activity includes:

- a. teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b. work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly.<sup>75</sup> Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

- c. relevant personal care, or health care provided by or provided under the supervision of a health care professional:
  - o personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;<sup>76</sup>
  - o health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

- paid work in specified places which is occasional and temporary and does not involve teaching, training; and
  - supervised activity which is paid in non-specified settings such as youth clubs, sports clubs etc.
-