



PORT·REGIS

SAFER RECRUITMENT PACK - INDEX

Page No	Document
2	Recruitment Privacy Notice
11	Recruitment, Selection and Disclosures Policy and Procedure
19	Application and Recruitment Process Explanatory Note
24	Policy on the Recruitment of Ex-Offenders
26	Policy on the Recruitment of Governors and Volunteers



PORT·REGIS

RECRUITMENT PRIVACY NOTICE

POLICY NAME	Recruitment Privacy Notice	POLICY OWNER	C Beaty-Pownall Director of People
APPROVED BY	Committee GRNS	DATE APPROVED	November 2024
DATE OF LAST REVIEW	October 2024	DATE OF NEXT REVIEW	October 2025
SOURCE DOCUMENT	ISBA template – Safer Recruitment Template Pack, July 2024		

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. It applies to all individuals applying for a position at the School, including positions as a member of staff (full time or part time), contractors, workers, governors, volunteers and peripatetic staff. It also applies to individuals we will contact in order to find out more about our job applicants, including referees, or those that are provided by job applicants as an emergency contact.

You are being sent a copy of this privacy notice because you are applying to work with us (whether as an employee, worker, or contractor). We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

Port Regis School ('School') is a 'controller' in relation to personal data and gathers and uses certain information about you. This means that we are responsible for deciding how we hold and use your personal information.

The School's contact details are as follows:

Motcombe Park, Shaftesbury, SP7 9QA

01747 857 800

office@portregis.com

Data protection principles

We will comply with the data protection law and principles when gathering and using personal information, as set out in our Data Protection Policy. This means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept safely and securely.

About the information we collect and hold

The table in Part 1 of the Schedule below summarises the information we collect and hold, up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part 2 of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate and necessary for specific legitimate purposes. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held on school premises in our filing systems and on our servers. It may also be held on our behalf by third party agencies, service providers and representatives.

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application, or the application you are supporting (e.g. as a referee) is successful and you (the job applicant) become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. This is likely to be for six months from the communication of the outcome of the recruitment exercise which takes account of both the time limit to bring claims and for claims to be received by the School. If there is a lawful reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If you are an applicant and your application is successful and you join the School, we will keep only the recruitment information that is necessary in relation to your employment. Further information is available in our Staff Privacy Notice.

Further details on our approach to information retention and destruction are available in our Retention of Records Policy.

Your data rights to correct and access your information and to ask for it to be erased

Please contact our Data Protection Lead with responsibility for data protection, Geraldine White, who can be contacted by DPL@portregis.com or 01747857902 if you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have other rights including the right to ask for information we hold and process to be erased ('the right to be forgotten') or not used in certain circumstances. Our Data Protection Lead will provide you with further information about your data rights, if you ask for it, including our Staff Privacy Notice.

Keeping your personal information secure

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

We also have procedures in place to deal with any suspected personal data breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

Our Data Protection Lead oversees compliance with this privacy notice. We hope that our Data Protection Lead can resolve any query or concern you raise about our use of your information. If not, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or telephone 0303 123 1113 for further information about your rights and how to make a formal complaint.

SCHEDULE ABOUT THE INFORMATION WE COLLECT AND HOLD

Part 1 Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your current and any former names, title, date of birth, gender, national insurance number, and contact details (i.e. current address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable the HR Department and/or relevant manager to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision Both the person(s) making the shortlisting decision and, if you are invited for interview, the interviewer will receive these details.
Information about you that is publicly available online through online searches	From standard online searches using a web browser, website, or social media platform.	Legitimate interest: to form part of the school's wider safeguarding due diligence. Legitimate interest: to make an informed decision to shortlist	To make an informed recruitment decision. The member of staff carrying out the search, if not involved in the decision-making process, may share any relevant information related to suitability with the individuals who will be interviewing. This way the decision makers will only have

		for interview and (if relevant) to recruit. To comply with our legal obligations including those contained in the statutory guidance for schools: Keeping Children Safe in Education (KCSIE).	the relevant information that may need to be addressed at interview and will not be exposed to other information. Search results will be reviewed and, if appropriate, explored with the applicant at interview. To comply with legal/regulatory obligations. For further information, see * below
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies For further information, see * below
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process To comply with our legal obligations to request references	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

Criminal Record Information or information that would make you	From your self- declaration form	Legitimate interests: to carry out a fair recruitment process including giving candidates the opportunity to	To make an informed recruitment decision and given candidates the opportunity to discuss their disclosure with the School.
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unsuitable to work with children		discuss their disclosure with the School before a DBS check is obtained. To comply with our legal obligations including those contained in the statutory guidance for schools: Keeping Children Safe in Education (KCSIE). For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	To comply with legal/regulatory obligations For further information, see * below
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Part 2 Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time keeping and attendance, the reason you left your current or most recent post, and facts of any substantiated safeguarding concerns/allegations	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations including those contained in the	To obtain the required reference about you To comply with legal/regulatory obligations
that meet the harm threshold under the statutory guidance “Keeping Children Safe in Education” (KCSIE), from references obtained about you from previous employers and/or education providers ☐		statutory guidance for schools: Keeping Children Safe in Education (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	Information shared with relevant managers and HR personnel

In respect of applicants for teaching positions who have lived or worked outside the UK, information about any sanctions or restrictions and/or any circumstances impacting your suitability to teach ☐	From a letter from the professional regulating authority in the country (or countries) in which you have worked	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations including those contained in the statutory guidance for schools: Keeping Children Safe in Education (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel Information shared with DBS and other regulatory authorities as required
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Information regarding your academic and professional qualifications ☐	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you To comply with our legal obligations	To make an informed recruitment decision
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) in accordance with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended) and, where appropriate, overseas criminal records checks ☐	From the Disclosure and Barring Service (DBS) From overseas jurisdictions in accordance with Home Office guidance In respect of agency and third-party staff (supply staff), from any agency or third party organisation In respect of fee-funded trainee teachers, from the initial teacher training provider	To perform the employment contract To comply with our legal obligations Legitimate interest: For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Your nationality and immigration status and information from related documents, such as your passport or	From you and, where necessary, the Home Office	To enter into/perform the	To carry out right to work checks

other identification and immigration information ☐		employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	Information may be shared with the Home Office
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You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our data protection policies, please contact our Data Protection Lead for further information DPL@portregis.com.



PORT·REGIS

RECRUITMENT, SELECTION AND DISCLOSURES POLICY AND PROCEDURE

For All Staff, including from Early Years upwards

POLICY NAME	Recruitment, Selection and Disclosures Policy and Procedure	POLICY OWNER	C Beaty-Pownall Director of People
APPROVED BY	Committee GRNS	DATE APPROVED	November 2024
DATE OF LAST REVIEW	October 2024	DATE OF NEXT REVIEW	October 2025
SOURCE DOCUMENT	ISBA template – Safer Recruitment Template Pack, July 2024		

1. General

Port Regis (“the School”) is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

We aim to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

All queries regarding our Application Form and recruitment process must be directed to Geraldine White, Director of HR & Legal.

An entry will be made on the Single Central Register for all current members of staff at the School, the governing body and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.

The School’s governing body is responsible for overseeing the management of the School. The School’s Senior Leadership Team are responsible for the day to day management of the School.

All checks will be made in advance of appointment or as soon as practicable after appointment.

2. Scope of this Policy

This Policy refers and applies to staff directly recruited and employed by the School. In the Education (Independent Schools Standards) (England) Regulations 2014, staff are defined as:

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

In the case of agency or contract workers, we should set out our safeguarding requirements in the contract between the organisation and the School and must obtain written confirmation from the agency or company that it has carried out the same checks as we would otherwise perform on any individual working at the school or college (or who will be providing education on the school or college's behalf, including through online delivery). We conduct identity checks on agency and contract workers on arrival in School and, in the case of agency workers (which includes supply staff), we must be provided with a copy of the appropriate level of DBS check.

We will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure – renewed every 3 years, right to work in the UK, barred list, prohibition, qualifications, overseas checks plus those checks set out in KCSIE as 'pre-employment' checks). The Single Central Record shows these checks have been made and we carry out our own identity check and have seen a copy of the disclosure (whether or not it discloses any information).

Certain individuals are automatically disqualified from acting in senior management positions within a charity. Whether an individual falls into the category of a senior management position is judged using the following criteria:

- A person who is accountable only to the governors, and who carries overall responsibility for the day-to-day management and control of the charity. At the School this would be the Headmaster.
- A person who is accountable only to the Headmaster or the governors, and who is responsible for the overall management and control of the charity's finances. At the School this would be the Senior Leadership Team.

Being disqualified means that a person can't take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or 'waived') the disqualification.

In respect of contractors, unchecked contractors will under no circumstances be allowed to work unsupervised in School. We will determine the appropriate level of supervision depending on the circumstances.

Any staff who TUPE (Transfer of Undertakings (Protection of Employment) Regulations 2006) transfer into the School's staff will be required to undertake the statutory requirements with regard to safer recruitment checks.

If staff are transferred under TUPE (gap of three months or less and information complete) information will be passed to the new employer and a note made on the Single Central Record that details have been accepted under TUPE.

3. Application Form

We will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms, but are permitted to be submitted alongside an Application Form.

We will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. Candidates for employed posts will receive a Job Description and Person Specification for the role applied for.

Checks will be made of previous employment history to ascertain satisfactory reasons for any gaps in employment. These checks will then be checked against references and any discrepancies discussed with the candidate.

The successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service ("DBS") for the position and, where appropriate, a check of the Barred List will be undertaken. Any

offer of employment will be conditional on obtaining such satisfactory check⁵. Additionally, successful applicants should be aware that they are required to notify us immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration.

The statutory guidance “Disqualification under the Childcare Act 2006” applies to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

We take our responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect his/her suitability to work with children must notify us immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings they may receive.

Staff and/or successful candidates who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Director of HR & Legal for more details.

If the candidate is currently working with children, on either a paid or voluntary basis, we will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.

If the candidate is not currently working with children but has done so in the past, we will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, we will still ask the current employer about the candidate’s suitability to work with children. Where the candidate has no previous employment history, we may request character references which may include references from the candidate’s school or university.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

4. Invitation to Interview

We will shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. At least two people will carry out the shortlisting exercise, consider any inconsistencies, look for gaps in employment and reasons given for them and explore all potential concerns.

As part of the shortlisting process, we will carry out an online search on shortlisted candidates as part of our due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which we may want to explore with an applicant at interview. This forms part of our wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

Shortlisted applicants will then be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail.

Shortlisted candidates should be asked to complete a self-declaration form in relation to 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. Applicants will be asked to sign a

declaration confirming that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

We will, where possible, obtain references prior to interview. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview.

All formal interviews will have a panel of at least two people chaired by the Headmaster/Bursar or another designated senior member of staff. It is recommended best practice that at least one person on the appointment panel will have undertaken safer recruitment training. The Chair of Governors should chair the panel for the Bursar's/Headmaster's appointment. The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Chair as to whether or not an interviewer should withdraw from the panel. Should the Chair have a conflict of interest, the Vice Chair shall decide whether the Chair should withdraw from the panel.

The Director of HR & Legal, who is safer recruitment trained, will undertake a safeguarding interview for all candidates. The interview will be conducted in person and the areas which it will explore will include suitability to work with children including where appropriate, any discussion of information shared by a candidate in their self-declaration form and any suitability issues arising from the recruitment process generally (online checks, gaps in employment history, references etc).

All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

We request that all candidates invited to interview also bring with them:

1. A current driving licence including a photograph or a passport and a full birth certificate;
2. A utility bill or financial statement issued within the last three months showing the candidate's current name and address;
3. Where appropriate any documentation evidencing a change of name;
4. Where applicable, proof of entitlement to work and reside in the UK.

Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

Candidates with a disability who are invited to interview should inform us of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

5. Conditional Offer of Appointment: Pre-Appointment Checks

Any offer to a successful candidate will be conditional upon:

1. Receipt of at least two satisfactory references (if these have not already been received);
2. Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK (if not already received);
3. A satisfactory enhanced DBS check and, if appropriate, a check of the Children's Barred List maintained by the DBS;
4. For a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State or any sanction or restriction imposed (that remains

current) by the historic General Teaching Council for England before its abolition in March 2012. Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:

- Planning and preparing lessons and courses for pupils;
 - Delivering and preparing lessons to pupils;
 - Assessing the development, progress and attainment of pupils; and
 - Reporting on the development, progress and attainment of pupils;
5. Verification of professional qualifications, including Qualified Teacher Status (QTS), where appropriate;
 6. Verification of successful completion of a statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999);
 7. **Where the successful candidate has worked or been resident overseas:** Such further checks and confirmations as we may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing us with a letter from the professional regulating authority in the country (or countries) in which they have 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];
 8. Evidence of satisfactory medical fitness;
 9. Receipt of a signed Self-Declaration form showing that the candidate is not disqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006;
 10. For a candidate to be employed into a senior leadership position as set out above under “Scope of this Policy”, receipt of a signed “senior charity manager positions: automatic disqualification declaration” confirming that the candidate is not disqualified from acting in a senior leadership position for a charity in accordance with the automatic disqualification rules for charities;
 11. Where the successful candidate will be taking part in the management of the School, a check will be carried out under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all governors, the Senior Leadership Team and heads of department.

It is our practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by us in strictest confidence and processed in accordance with the Recruitment Privacy Notice and Data Protection Policy. 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 i.e. proposed workload, extra-curricular activities, and/or layout of the School.

We are aware of our duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

6. References

We will seek the references referred to in section 5 above for shortlisted candidates (including internal applicants) and will approach previous employers for information to verify particular experience or

qualifications, before interview. One of the references must be from the applicant's current or most recent employer. References must be received by a senior person with appropriate authority. If the candidate does not wish us to take up references in advance of the interview, they should notify us at the time of applying.

We will ask all referees if the candidate is suitable to work with children and to provide facts of any substantiated safeguarding concerns or allegations that meet the harm threshold set out in Part 4 of the statutory guidance 'Keeping Children Safe in Education'. Substantiated allegations that meet the harm threshold should be included in references. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated, or malicious should not be included in any reference.

We will only accept references obtained directly from the referee and will not rely on references or testimonials provided by the applicant or open references or testimonials. We will verify all references. Where references are received electronically, we will ensure they originate from a legitimate source.

We will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.

7. Criminal Records Policy

We will refer to the Department for Education ("DfE") document, 'Keeping Children Safe in Education' and any amended version in carrying out the necessary required DBS checks.

We comply with the provisions of the DBS Code of Practice, a copy of which may be obtained on request, or accessed here:

<https://www.gov.uk/government/publications/dbs-code-of-practice>.

There are limited circumstances where we will accept a check from another educational institution which are as follows:

This is where the new member of staff ("M") has worked in: –

- (a) A school or a maintained school in England in a position which brought M regularly into contact with children or young persons;
- (b) A maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or
- (c) An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons,

during a period which ended not more than three months before M's appointment.

In these circumstances we may apply for a disclosure but are not required to do so. A new, separate barred list check will be obtained.

DBS Update Service

Where an applicant subscribes to the DBS Update Service the applicant must give us consent to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required.

If disclosure is delayed

A short period of work is allowed under controlled conditions, at the Headmaster's⁵ discretion. However, if an 'enhanced disclosure' is delayed, a Headmaster may allow the member of staff to commence work:

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

8. Retention, Security of Records and Data Protection Obligations

We will comply with our obligations regarding the retention and security of records in accordance with the DBS Code of Practice and our obligations under our Data Protection Policy. Copies of DBS certificates will not be retained.

We will comply with our data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice and the Data Protection Policy.

Appendix

Policy on the Recruitment of Ex-Offenders

We will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. We make appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar them from employment within the School. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for us to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for us to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful for us to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the statutory guidance "Disqualification under the Childcare Act 2006".

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. We will report the matter to the Police and/or the DBS if:

- we receive an application from a disqualified person;
- we are provided with false information in, or in support of, an applicant's application; or
- we have serious concerns about an applicant's suitability to work with children.

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, we will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- whether the conviction or caution is 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020 (if yes, it will not be taken into account);
- 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;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

If the post involves regular contact with children, it is our 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, serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is our 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.

If the post involves some driving responsibilities, it our normal policy to consider it a high risk to employ anyone who has been convicted of drink driving.



PORT·REGIS

APPLICATION AND RECRUITMENT PROCESS EXPLANATORY NOTE

POLICY NAME	Application and Recruitment Process Explanatory Note	POLICY OWNER	C Beaty-Pownall Director of People
APPROVED BY	Committee GRNS	DATE APPROVED	November 2024
DATE OF LAST REVIEW	October 2024	DATE OF NEXT REVIEW	October 2025
SOURCE DOCUMENT	ISBA template – Safer Recruitment Template Pack, July 2024		

1. General

Port Regis School (“the School”) is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

We aim to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

All queries regarding our Application Form and recruitment process must be directed to the Director of HR & Legal.

2. Application Form

Applications will only be accepted from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms but are permitted to be submitted alongside a completed Application Form.

Candidates should be aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. Applicants will receive a Job Description and Person Specification for the role applied for.

As the job for which you are applying involves substantial opportunity for access to children, it is important that you provide us with accurate answers.

The successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service (“DBS”) for the post and, where appropriate, a check of the Barred List maintained by the DBS will be made. Any offers of appointment will be made conditional on obtaining such satisfactory checks.

Additionally, successful applicants should be aware that they are required to notify us immediately if there are any reasons why they should not be working with children.

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

We take our responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect his/her suitability to work with children must notify us immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff and/or successful candidates who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Director of HR & Legal for more details.

We have a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent duty. Schools are required to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to confidently recognise susceptibility to terrorism and be aware of what action to take in response. We also ensure that those at risk of radicalisation are identified and appropriate support is provided.

If you are currently working with children, on either a paid or voluntary basis, your current employer will be asked about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether you have been the subject of any child protection concerns or allegations and if so the outcome of any enquiry or disciplinary procedure. Any information about past disciplinary action or substantiated allegations will be considered in the circumstances of the individual case.

If you are not currently working with children but have done so in the past, that previous employer will be asked about those issues. Where neither your current nor previous employment has involved working with children, your current employer will still be asked about your suitability to work with children. Where you have no previous employment history, we may request character references which may include references from your school or university.

You should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if you have been appointed, and a possible referral to the police and/or DBS.

3. Invitation to Interview

Applicants will be shortlisted according to the relevance and applicability of their professional attributes and personal qualities to the role. Shortlisted applicants will then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail.

As part of the shortlisting process, we will carry out an online search on shortlisted candidates as part of our due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which we may want to explore with an applicant at interview. This forms part of our wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

Shortlisted candidates will be asked to complete a self-declaration form in relation to their criminal record or information that would make them unsuitable to work with children. Applicants will be asked to sign a

declaration confirming that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

All formal interviews will have a panel of at least two people chaired by the Headmaster/Bursar or another designated senior member of staff. It is recommended best practice that at least one person on the appointment panel will have undertaken safer recruitment training. The Chair of Governors should chair the panel for the Bursar's/Headmaster's appointment. The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Chair as to whether or not an interviewer should withdraw from the panel. Should the Chair have a conflict of interest, the Vice Chair shall decide whether the Chair should withdraw from the panel.

The Director of HR & Legal, who is safer recruitment trained, will undertake a safeguarding interview for all candidates. The interview will be conducted in person and the areas which it will explore will include suitability to work with children including where appropriate, any discussion of information shared by a candidate in their self-declaration form and any suitability issues arising from the recruitment process generally (online checks, gaps in employment history, references etc).

All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

We request that all candidates invited to interview also bring with them:

1. A current driving licence including a photograph or a passport and a full birth certificate;
2. A utility bill or financial statement issued within the last three months showing the candidate's current name and address;
3. Where appropriate any documentation evidencing a change of name;
4. Where applicable, proof of entitlement to work and reside in the UK.

Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

Candidates with a disability who are invited to interview should inform us of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

4. Conditional Offer of Appointment: Pre-Appointment Checks

Any offer to a successful candidate will be conditional upon:

1. Receipt of at least two satisfactory references (if these have not already been received), including for internal appointments. All references should be provided by a senior person with appropriate authority, subject to the satisfaction of the School;
2. Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK;
3. A satisfactory enhanced DBS check and if appropriate, a check of the Barred List maintained by the DBS;
4. For a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State or any sanction or restriction imposed (that remains current) by the historic General Teaching Council for England before its abolition in March 2012;

5. Verification of professional qualifications, including, where applicable, any award of Qualified Teacher Status;
6. Verification of successful completion of a statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999), where relevant;
7. Where the successful candidate has lived or worked or been resident outside the UK, such further checks and confirmations as we may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing us with a letter from the professional regulating authority in the country (or countries) in which they have 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;
8. Evidence of satisfactory medical fitness;
9. Receipt of a signed Self-Declaration form showing that the candidate is not disqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006”;
10. For a candidate to be employed into a senior management position as set out within our Recruitment, Selection and Disclosures Policy and Procedure, receipt of a signed “senior charity manager positions: automatic disqualification declaration” confirming that the candidate is not disqualified from acting in a senior management position for a charity in accordance with the automatic disqualification rules for charities;
11. If you are undertaking a management role, a check that you have not been prohibited from participating in the management of independent schools.

It is our practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by us in strictest confidence and used as set out in our Recruitment Privacy Notice and Data Protection Policy. 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 i.e. proposed workload, extra-curricular activities, layout of the School etc.

We are aware of our duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

5. References

We will seek the references referred to in section 4 above for all shortlisted candidates, including internal candidates and may approach previous employers for information to verify particular experience or qualifications, before interview. If you do not wish us to take up references in advance of the interview, please notify us at the time of submitting your application.

For internal candidates, formal written references may be sought from a senior person with appropriate authority.

All referees will be asked if the candidate is suitable to work with children and to provide facts of any substantiated safeguarding concerns or allegations that meet the harm threshold set out in Part 4 of the statutory guidance ‘Keeping Children Safe in Education’. Substantiated allegations that meet the harm threshold will be included in references. Any repeated concerns or allegations which do not meet the harm

threshold which have all been found to be false, unfounded, unsubstantiated, or malicious should not be included in any reference.

We will compare any information provided by the referee with that provided by the candidate on the application form. Any inconsistencies will be discussed with the candidate.

6. Criminal Records Policy

We will refer to the Department for Education (“DfE”) document, ‘Keeping Children Safe in Education’ and any amended version in carrying out the necessary required DBS checks.

We comply with the provisions of the DBS Code of Practice, a copy of which may be obtained on request or accessed here: <https://www.gov.uk/government/publications/dbs-code-of-practice>.

7. Retention and Security of Records and Data Protection

We will comply with our obligations regarding the retention and security of records in accordance with the DBS Code of Practice and our obligations under our Data Protection Policy. Copies of DBS certificates will not be retained. Details of how we use candidates’ data is explained in the Recruitment Privacy Notice and Data Protection Policy.



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POLICY ON THE RECRUITMENT OF EX-OFFENDERS

POLICY NAME	Policy on the Recruitment of Ex-Offenders	POLICY OWNER	C Beaty-Pownall Director of People
APPROVED BY	Committee GRNS	DATE APPROVED	November 2024
DATE OF LAST REVIEW	October 2024	DATE OF NEXT REVIEW	October 2025
SOURCE DOCUMENT	ISBA template – Safer Recruitment Template Pack, July 2024		

We will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. We make appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar him/her from employment within the School. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for us to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for us to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful for us to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006".

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. We will report the matter to the Police and/or the DBS if:

- we receive an application from a disqualified person;
- we are provided with false information in, or in support of an applicant's application; or
- we have serious concerns about an applicant's suitability to work with children

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, we will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;

- whether the conviction or caution is 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020 (if yes, it will not be taken into account);
- 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;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

If the post involves regular contact with children, it is our 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, serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is our 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.

If the post involves some driving responsibilities, it is our normal policy to consider it a high risk to employ anyone who has been convicted of drink driving.

Data Protection Obligations

We will comply with our data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice and the Data Protection Policy.



POLICY ON THE RECRUITMENT OF GOVERNORS AND VOLUNTEERS

For all governors and volunteers, including from Early Years upwards

POLICY NAME	Policy on the Recruitment of Governors and Volunteers	POLICY OWNER	C Beaty-Pownall Director of People
APPROVED BY	Committee GRNS	DATE APPROVED	November 2024
DATE OF LAST REVIEW	October 2024	DATE OF NEXT REVIEW	October 2025
SOURCE DOCUMENT	ISBA template – Safer Recruitment Template Pack, July 2024		

1. General

Port Regis School (“the School”) is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

We aim to recruit volunteers and governors that share and understand our commitment to the aims of the School.

All queries on our recruitment process must be directed to Director of HR & Legal.

2. Recruitment of Governors and Trustees

As Trustees of a registered charity, the Governors of the School are responsible for the selection and appointment of new Governors. This is a legal responsibility that cannot be delegated, although we encourage the Headmaster, Bursar, and other senior staff and organisations, such as our alumnae, or those who are close to the School, such as parents, to suggest the names of potential candidates. As Charity Trustees we are aware of the importance of identifying the appropriate mixture of skills and experience that we and our successors need to manage the multi-faceted affairs of a modern school which is also a Company Limited by Guarantee (CLBG), a medium sized business and an important local employer, with some 150 employees. Schools should avoid appointing or retaining trustees who are disqualified from being a trustee, unless the Charity Commission has given a waiver. All potential trustees should complete a charity trustee positions: automatic disqualification declaration before beginning the selection process.

Following return of the completed disqualification declaration, all Governors complete a selection process, which requires the submission of a CV, completion of an interview with two or three senior Governors (including the Chair of Governors and Deputy Chair) and a meeting with the Headmaster. Every Governor has an enhanced DBS check unless they will be undertaking a regulated activity, in which case they will

undertake an enhanced DBS check with a barred list check. Each appointment is made by the full Board for a period of 3 years. We arrange for all new Governors to receive a thorough induction in child protection and in the compliance and fiduciary duties of governance. New Governors should spend a day at the School in order to meet the key personalities and to gain an insight into the curriculum and to meet groups of pupils.

2.1 Governor's Selection Process

2.1.1 The Initial Stage

When a potential Governor has been identified, who has expressed an interest; he or she will be invited to visit the School and to meet the Chair of Governors and Deputy Chair informally, and to have a tour of the School. If the Headmaster is not present at that stage, they will probably arrange a separate informal meeting. At that meeting, we will briefly describe our strategic vision for the next 5 years and the direction in which the Governors see the School moving. Our aim at the informal meeting is to ensure that every prospective Governor has a clear understanding of the commitment expected of him or her, in terms of time and attendance and is given sufficient material about the School that is in the public domain (prospectus, latest ISI Inspection Report, Statutory Accounts and Annual Return for the previous year) to allow a well-informed judgement to be made before committing themselves to the appointment process. At the informal meeting, we also brief all potential candidates about the range of statutory checks that are required as part of the appointment process.

2.1.2 The appointment process

The second step is to invite the prospective Governor to submit a copy of their CV under a covering letter to the Chair of Governors. Prospective Governors are interviewed by the Chair of Governors and Deputy Chair and potentially another Governor who will (if appropriate) recommend the appointment to the full Governing Body. Care is taken to select Governors who are prepared to serve for a minimum of three years (which is the normal length of a term of appointment), and to be prepared to commit the time necessary to get to know the School.

All new appointments are formally recorded in the minutes of the Board, and a formal letter of appointment is sent by the Chair, which specifies the term of the appointment, the total tenure for a Governor, and, if appropriate, the sub-Committee(s) to which the new Governor has been appointed.

2.1.3 Safer recruitment checks

The Clerk to the Governors at the School will obtain the following from the new potential governor before their appointment is confirmed:

1. an enhanced DBS certificate;
2. if the Governor will be undertaking a regulated activity, a barred list check;
3. evidence of their entitlement to work in the UK, where relevant;
4. confirmation that they are not disqualified from acting as a Charity Trustee or Company Director, for example by virtue of an undischarged bankruptcy;
5. evidence that the Governor has not been prohibited from participating in the management of independent schools;
6. if the new Governor is also to be appointed as a Company Director, a completed Form APO1 (downloadable from <https://www.gov.uk/government/publications/appoint-a-director-ap01>) will be sent to Companies House to register the appointment.

All the paperwork is handled by the Clerk to the Governors and HR Department.

2.2 Checks regarding the Chair of Governors

If the Chair of Governors is to change, we will ensure that the DfE obtains an enhanced criminal records check, and checks both the individual's identity and right to work in the UK before they take up the appointment. Further overseas checks are required if the person lives or has lived outside the UK. The Chair's disclosure application has to be made by the DfE; we cannot handle it as we would for all other Governors. So, even if a Governor, whom the School has already checked, becomes Chair, the DfE has to make another check.

2.3 Induction of Governors and Trustees

Governors would be provided with training on the following once in post:

- Child Protection Policy and safeguarding obligations
- Prevent awareness training
- Protect Duty
- Staff Behaviour Policy
- Health and Safety
- Confidentiality obligations
- Supervision
- Data Protection
- Online Safety (to include an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring).

2.4 Data Protection

We will comply with our obligations under the relevant data protection legislation. Governors' attention should be drawn to the Staff Privacy Notice and Data Protection Policy which sets out details of how we will process Governors' personal data.

3. The recruitment of other volunteers

3.1 General

Volunteers at our school bring with them a range of skills and experience that can enhance the learning opportunities of pupils. The Council therefore, welcomes and encourages volunteers from the local community to assist in its day to day running. The kinds of activities that volunteers may assist with are hearing pupils read, working with small groups of pupils to assist them in their learning, working alongside individual pupils, as an additional tutor, or accompanying school visits.

Volunteers will be recruited and vetted via the process set out below. Volunteers who take part in a regulated activity will be subject to safer recruitment checks.

3.2 Recruitment

Volunteers will be subject to an informal recruitment process which will involve a meeting with the relevant Head of Department to discuss our requirements and the skills of the volunteer. The purpose of this meeting will be to understand whether the prospective volunteer has any previous relevant experience and find out whether the expectations and requirements of each party meet and whether there is a volunteering opportunity with us.

Any volunteering placement may be offered subject to the following checks, if relevant:

1. an enhanced DBS certificate;
2. if the volunteer will be undertaking a regulated activity, a barred list check;
3. evidence of their entitlement to work in the UK, where relevant;
4. if the successful candidate will be undertaking a regulated activity and has worked or been resident overseas, such checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered;
5. a declaration that they are not disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006" if appropriate;
6. depending on the nature of the role, the volunteer may also be asked to sign a confidentiality statement; and
7. references may also be required.

3.3 Induction

Volunteers will be provided with training on the following matters once the volunteering placement commences:

- Child Protection Policy and safeguarding obligations
- Policy for induction of new staff, governors and volunteers in child protection
- Prevent awareness training
- Protect Duty
- Staff Behaviour Policy
- Health and Safety
- Confidentiality obligations
- Supervision
- Data Protection

3.4 Data Protection

We will comply with our obligations under the relevant data protection legislation. Volunteers' attention should be drawn to the Staff Privacy Notice and Data Protection Policy which sets out details of how we will process volunteers' personal data.