



Recruitment,
Selection and
Disclosure Policy
and Procedure



Reviewed by: Head, HR Manager
Reviewed: September 2023
Review: September 2024

1. Introduction

Godolphin is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff. The School recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment. The School also has due regard to the need to prevent children from being drawn into radicalisation and terrorism and is committed to recruiting members of staff who will support this aim.

The aims of the School's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position
- to deter unsuitable applicants from applying for roles with vulnerable groups
- to ensure that all job applicants are considered equally and consistently
- to ensure that no job applicant is treated unfairly on any grounds including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE) (formerly the Department for Children, Schools and Families (DCSF)), Keeping Children Safe in Education (KCSIE) and any guidance or code of practice published by the Disclosure and Barring Service (DBS) and
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

2. Recruitment and selection procedure

All advertisements for employment at the School will carry a clear statement that the School will carry out Enhanced DBS checks and a barred list check on all staff and unsupervised volunteers engaging in 'regulated activity', including an online search on short-listed candidates. All employees and volunteers will be required to obtain DBS clearance and a barred list check will be carried out.

All applicants for employment will be required to complete an application form containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. A curriculum vitae will not be accepted in place of the completed application form.

Application forms include declarations with reference to convictions and disqualifications. For those working in the Prep or with management responsibility for the Prep, staff will need to declare that they are not 'disqualified from childcare'. The School will not knowingly employ people to work in childcare or allow them to be directly concerned in its management if they are directly 'disqualified from childcare'.

Applicants will receive a job description and person specification for the role applied for. Application forms, job descriptions and the School's Safeguarding Policy are available on our website and from the HR Department.

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

The interview process will explore the applicant's ability to carry out the job description and meet the person specification. The interviewer or panel will explore any anomalies or gaps that have been identified in the candidate's application in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with the DfE Safer Recruitment Training).

At least one member of any interviewing panel will have undertaken safer recruitment training within the last five years or had refresher training, as applicable.

All applicants who are invited to an interview will be required to bring evidence of their identity, right to work in the UK, address and qualifications. Original documents only will be accepted and photocopies will be taken. Unsuccessful applicants' personal documents will be destroyed securely following the end of the recruitment programme.

If it is decided to make an offer of employment following the formal interview, any such employment will not commence until the following checks have been successfully undertaken and authorisation to commence employment issued:

- the agreement of a mutually acceptable start date and the subsequent signing of a contract incorporating the School's standard terms and conditions of employment
- verification of the applicant's identity (where that has not previously been verified)
- the receipt of two references (one of which must be from the applicant's most recent employer) which the School considers to be satisfactory
- for teaching positions, confirmation from the Teaching Regulation Agency that the applicant is not subject to a prohibition order
- the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory
- where the position amounts to "regulated activity" (see section 4.3 below) confirmation that the applicant is not named on the Children's Barred List administered by the DBS*
- verification of the applicant's medical fitness for the role (see section 3 below)
- verification of the applicant's right to work in the UK

- any further checks which are necessary as a result of the applicant having lived or worked outside of the UK
- 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)

*A check of the Children's Barred List is not permitted if an individual will not be undertaking 'regulated activity'. Whether a position amounts to 'regulated activity' must therefore be considered by the School in order to decide which DBS checks are appropriate. It is however likely that in nearly all cases a Children's Barred List check will be carried out.

The recruitment process is concluded only when the HR Manager has reviewed the personnel file, record of checks and associated documentation, and has signed off an authorisation for the staff member to commence work. Once the HR department has received this authorisation then the staff member can be informed that they may commence employment at the School.

3. Medical fitness

The School is legally required to verify the medical fitness of anyone to be appointed to a post at the School. This will usually be after an offer of employment has been made but before the appointment can be confirmed, however, in cases where the School needs to establish that the candidate will be able to carry out a function that is intrinsic to the work concerned, the School may ask for a pre-employment health questionnaire from short-listed candidates, in accordance with Section 60 of the Equality Act 2010.

It is the School's practice that all applicants to whom an offer of employment is made must either obtain a statement from their GP or complete a medical self-certification stating that they are fit to carry out the role.

The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn on medical grounds without first consulting with the applicant, obtaining medical evidence, considering reasonable adjustments and suitable alternative employment.

4. Pre-employment checks

In accordance with the recommendations set out in the Guidance, KCSIE and the requirements of the Education (Independent School Standards) (England) Regulations 2014 and the Boarding Schools National Minimum Standards, the School carries out a number of pre-employment checks in respect of all prospective employees.

4.1 Verification of identity and address

All applicants who are invited to an interview will be required to bring with them evidence of identity, right to work in the UK, address and qualifications as set out below and in the list of valid identity documents at Appendix 1 (these requirements comply with DBS identity checking guidelines):

- Birth Certificate
- two further documents from either of Group 1, Group 2a or Group 2b, one of which must verify the applicant's current address and
- original documents confirming any educational and professional qualifications referred to in their application form

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.

The School asks for the date of birth of all applicants (and proof of this) in accordance with the Guidance and KCSIE. Proof of date of birth is necessary so that the School may verify the identity of, and check for any unexplained discrepancies in, the employment and education history of all applicants. The School does not discriminate on the grounds of age.

4.2 References

References will be taken up on short listed candidates prior to interview. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

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. Neither referee should be a relative or someone known to the applicant solely as a friend. The School will select the referees it deems as most suitable, from the applicant's employment and education history.

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

- the applicant's dates of employment, salary, job title / duties, reason for leaving, performance and disciplinary record
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be false, unsubstantiated, unfounded or malicious
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people, except where the allegation or concerns were found to be false, unsubstantiated, unfounded or malicious
- whether they suspect the applicant of being involved in extremism

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials.

The School will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

Suitability references will also be sought for internal candidates.

4.3 Criminal records check

Due to the nature of the work, the School applies for an enhanced disclosure from the DBS in respect of all prospective staff members, governors, volunteers and for anyone returning to work after a break of three months or more.

It is not necessary to undertake vetting checks on visitors to the Head/other staff or those who have only brief contact with children in the presence of a teacher; visitors carrying out repairs or servicing equipment; secondary school pupils on work experience or similar; those on the School site when the students are not present; and students aged eighteen or over studying in the School. Individuals returning from maternity leave, sabbaticals or similar, where continuity of employment is maintained, do not need to be checked as new employees although the School may choose to renew the checks.

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 attempt to apply for a position at the School. The School will make a report to the Police and / or the DBS if:

- it receives an application from a barred person
- it is provided with false information in, or in support of an applicant's application
- it has serious concerns about an applicant's suitability to work with children.

With regard to any applicant in possession of a portable DBS (under the three month rule), a separate Barred List check will also be completed and recorded on the Centralised Register. This check is not necessary if the staff member has an unbroken subscription to the DBS Update Service, provided the Update Check is carried out before they come into contact with pupils. The School will take due regard to the source of the original DBS check; it must normally be at an enhanced level. If the original DBS was not obtained in a school context, it may not include any required prohibition checks, and these would be obtained separately through Teacher Services.

It is a condition of appointment that new employees are registered with the Government DBS Update Service (online <https://www.gov.uk/dbs-update-service>) during their employment with the School. If applicants are not already registered, they will need to register within 30 days of receiving their DBS Certificate (posted to home address) at a cost of (currently) £13 per year (payable by the employee).

Prior to 29 May 2013 an enhanced disclosure contained details of all convictions on record (including those which are defined as "spent" under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. It could also contain non-conviction information from local police records which a chief police officer considered relevant to the role applied for at the School.

As of 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The DBS and the Home Office have developed a set of filtering rules relating to spent convictions.

Filtering is a term used to describe the process which will identify and removed protected convictions and cautions so that they are no longer disclosed on a DBS certificate. DBS filtering guidance can be found here: <https://www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide>

The list of "specified offences" which must always be disclosed contains a large number of offences, which includes certain sexual, violent and other offences that are considered so serious they will always be disclosed, regardless of when they took place or of the person's previous or subsequent criminal record. The list of "specified offences" can be found at: <https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check>

The School applies for an enhanced disclosure from the DBS via an umbrella organisation, 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 maintained by the DBS and an additional barred list check through the umbrella organisation. Any position undertaken at, or on behalf of, the School (whether paid or unpaid), will amount to 'regulated activity' if it is carried out:

- frequently, meaning once a week or more, or
- overnight, meaning between 2.00 am and 6.00 am, or
- satisfies the "period condition", meaning four times or more in a 30-day period, and
- provides the opportunity for contact with children.

This definition will cover nearly all posts at the School. Limited exceptions could include an administrative post undertaken on a temporary basis in the School office outside of term time.

It is for the School to decide whether a role amounts to 'regulated activity' taking into account all the relevant circumstances.

The DBS issues a DBS disclosure certificate to the subject of the check only, not to the School. It is a condition of employment that the original disclosure certificate is provided to the School as soon as it is received by the applicant. Original certificates should not be sent by post. Applicants must instead bring the original certificate into the School. A convenient time and date for doing so should be arranged with HR Department as soon as the certificate has been received. Applicants who are unable to attend School to provide the certificate are required to send in a certified copy by post or email as soon as possible once the original disclosure certificate has been received. Certified copies must be sent to the HR Department. Where a certified copy is sent, the original disclosure certificate must still be provided to the HR

Department. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School.

If there is a delay in receiving a DBS disclosure, the Head has discretion to allow an individual to begin work pending receipt of the disclosure. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to 'regulated activity'), have been completed, a risk assessment has been undertaken by DSL on the behalf of the Head and appropriate supervision has been put in place. Risk assessments will be reviewed and signed every 2 weeks pending receipt of the DBS disclosure.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants may also be asked to provide further information, including a criminal records check from the relevant jurisdiction(s). The School checks, using the Teaching Regulation Agency (TRA) system, whether applicants from countries in the European Economic Area (EEA) who will carry out 'teaching work' are subject to a sanction or restriction imposed by another EEA professional regulatory authority for teachers. Whilst a restriction applied in another country is not legally binding in England the School makes employment decisions with the knowledge of the existence of any such sanctions.

4.4 Management Position Checks

Staff appointed to management positions are subject to a s.128 direction, including staff who are promoted internally.

The following are considered to be in management positions for the purpose of this check:

- Governors
- Head teachers
- All staff on the senior management team (including non-teaching staff)
- Teaching positions with departmental headship

5. Contractors and agency staff

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. The employment business must provide written confirmation for any member of staff supplied by that business who has lived abroad.

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.

The School will independently verify the identity of staff supplied by contractors or an agency in accordance with section 4.1 above.

6. Centralised Register of Members of Staff

In addition to the various staff records kept in School and on individual personnel files, a Single Centralised Record (SCR) of recruitment and vetting checks is kept in accordance with the DfE

requirements. This is kept up-to-date and retained by the HR Department. The Centralised Register will contain details of the following:

- all employees who are employed to work at the School
- all employees who are employed as supply staff to the School whether employed directly or through an agency
- 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 e.g., sports coaches etc.

7. Policy on recruitment of ex-offenders

7.1 Background

The School will not unfairly discriminate against any applicant for employment on the basis of conviction or other details revealed. The School makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment within the School. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph 7.2 below.

All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except for those to which the DBS filtering rules apply (see paragraph 4.3 above). A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

7.2 Assessment criteria

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process the School will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question
- the seriousness of any offence or other matter revealed
- the length of time since the offence or other matter occurred
- whether the applicant has a pattern of offending behaviour or other relevant matters
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person
- whether the applicant disclosed the relevant information when completing the School application form and the pre-employment disclosure form at interview

If the post involves regular contact with children, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any of 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 the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

7.3 Assessment procedure

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process, the School will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the DSL, or the Head of the School before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, he / she can do so by contacting the DBS direct. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the School will, 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.

7.4 Retention and security of disclosure information

The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information but is under no obligation to do so.

In particular, the School will:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of the HR Department and the School's senior management team
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months. The School will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken
- ensure that any disclosure information is destroyed by suitably secure means such as shredding
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates

8. Privacy statement and use, retention and destruction of personal data

As part of the application process, we will ask you for personal information to assist with our recruitment process. We are absolutely committed to protecting your privacy. We collect information on our users through our job application form and only our staff will be able to see your information. No one from outside the School will be able to see the information you submitted. When you send us your application form, remember to log out and close your browser/email client when you have finished your user session. This is to ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place like a library or Internet cafe. You as an

individual are responsible for the security of, and access to, your own computer. Information on your job application form may be held on manual or computer systems. We comply with the GDPR and observe strict confidentiality and disclosures for payroll, personnel administration and statistical purposes.

We ask for personal information from job applicants to assist with our recruitment process. The personal information you supply will be kept in a recruitment folder. Employees involved with short-listing and appointment will have access to this data. This could be the Senior Management Team, Heads of Department, Line Managers, personnel and departmental support employees. We will not disclose this information to anyone else. If you are unsuccessful, we will usually destroy your application form and any other papers submitted no more than 12 months after the appointment has been made, other than your basic details and email address should you tick the relevant box on the application form to enable us to be in touch about any future vacancies you may be interested in. You should send any queries about the processing of your personal data to the Privacy Officer, privacy@godolphin.org. Under GDPR, ethnic origin, disability, criminal convictions and health information is defined as sensitive data. We are required by law to monitor our recruitment practices.

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 his / her 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. 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. This documentation will be retained by the School on the employee's personnel file for the duration of the successful applicant's employment with the School. It will ordinarily be retained for a period of six years after employment terminates after which it will be securely destroyed.

9. Referrals to the DBS and the Teaching Regulation Agency (TRA)

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:

- has applied for a position at the School despite being barred from working with children, or
- 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

If the individual referred to the DBS is a teacher, the School may also decide to make a referral to the TRA.

10. Queries

If an applicant has any queries on how to complete the application form or any other matter he / she should contact the HR Department.

TWO ROUTES OF ID CHECKING

Route 1 (For all applicants except non-UK national applicants needing a DBS check for paid work in the UK)

The applicant must be able to show the following:

- 1 document from Group 1, below; and
- 1 further document from either Group 1, or Group 2a or 2b, below

Route 1a (For non-UK national applicants needing a DBS check for paid work in the UK)

The applicant must be able to show the following:

- 1 document from Group 1a, below; and
- 1 further document from either Group 1, Group 2a or 2b, below

Route 2 (For all applicants except non-UK national applicants needing a DBS check for paid work in the UK)

If the applicant doesn't have any of the documents in Group 1, they must be able to show:

- 1 document from Group 2a
- 2 further documents from either Group 2a or 2b

Identity Documents

Group 1: Primary identity documents

Document	Notes
Passport	Any current and valid passport
Current biometric residence permit	UK
Current driving licence photocard - (full or provisional)	UK, Isle of Man, and Channel Islands
Birth certificate - issued within 12 months of birth	UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, e.g. embassies, High Commissions and HM Forces
Adoption certificate	UK and Channel Islands

Group 2a: Trusted government documents

Document	Notes
Current driving licence photo-card - (full or provisional)	All countries outside the UK (excluding Isle of Man and Channel Islands)
Current driving licence (full or provisional) - paper version (if issued before 1998)	UK, Isle of Man, and Channel Islands
Birth certificate - issued after time of birth	UK, Isle of Man and Channel Islands
Marriage/civil partnership certificate	UK and Channel Islands
Immigration document, visa or work permit	Issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa/permit must relate to the non-UK country in which the role is based
HM Forces ID card	UK
Firearms licence	UK, Channel Islands and Isle of Man

Group 2b: Financial and social history documents

Document	Notes	Issue date and validity
Mortgage statement	UK	Issued in the last 12 months
Bank or building society statement	UK and Channel Islands	Issued in last 3 months
Bank or building society account opening confirmation letter	UK	Issued in last 3 months

Credit card statement	UK	Issued in last 3 months
Financial statement, for example a pension or endowment	UK	Issued in last 12 months
P45 or P60 statement	UK and Channel Islands	Issued in last 12 months
Council Tax statement	UK and Channel Islands	Issued in last 12 months
Letter of sponsorship from future employment provider	Non-UK only - valid only for applicants residing outside of the UK at time of application	Must still be valid
Utility bill	UK - not mobile telephone bill	Issued in last 3 months
Benefit statement, for example Child Benefit or pension	UK	Issued in last 3 months
Central or local government, government agency, or local council document giving entitlement, for example from the Department for Work and Pensions, the Employment Service, HMRC	UK and Channel Islands	Issued in last 3 months
EEA National ID card		Must still be valid
Irish Passport Card	Cannot be used with an Irish passport	Must still be valid
Cards carrying the PASS accreditation logo	UK, Isle of Man and Channel Islands	Must still be valid
Letter from head teacher or college principal	UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be provided	Must still be valid
Non-UK Bank or building society statement	Branch must be located in the country in which the applicant lives and works	Issued in last 3 months

