



**HOLMER GREEN SENIOR SCHOOL**

**RECRUITMENT  
POLICY**

February 2024

## **Recruitment Policy and Generic Procedures**

### **1.0 Policy**

1.1 This policy is governed by the School's principles of non-discrimination and is designed to achieve the best match between an individual's knowledge, skills, experience and character against the requirements of the vacant position whilst recognising the need for flexibility to respond to changing conditions.

1.2 It aims to promote fairness and consistency in the treatment of all existing and potential members of staff and assist the school to be successful through the people it employs.

1.3 Holmer Green Senior School is committed to safeguarding and promoting the welfare of children and young people and expects all staff (including volunteers) working for, or on behalf of, the School to share in this commitment.

1.4 This policy follows the guidelines for safeguarding children and safer recruitment for children identified by the Department for Education (DfE) and is linked to the School's Safeguarding policy. In addition, this policy complies with any guidelines or code of practice published by the Disclosure and Barring Service (DBS) and with Keeping Children Safe in Education September 2023.

1.5 All staff working for, or on behalf of, the School have a duty to act in accordance with this policy ensuring compliance with DfE standards and non-discrimination against existing or potential members of staff.

1.6 The School will not unlawfully discriminate on the grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, trade union membership part-time or fixed-term status and any criminal cautions or convictions.

### **2.0 Recruitment Procedure**

2.1 Holmer Green Senior School regularly reviews its recruitment procedure to ensure the safety of its pupils by preventing, as far as possible, unsuitable people from working at the School. There are two separate recruitment procedures, due to the structure within the School, for the appointment of academic and support staff. Both procedures embrace the following common elements to ensure compliance and equality. Procedures also need to be compliant with all relevant legislation including the statutory guidance published by the Department for Education (DfE), Safeguarding Children and Safer Recruitment in Education (the Guidance), the Code of Practice published by the DBS and Keeping Children Safe in Education 2023.

2.2 The Headteacher identifies staffing needs and evaluates and prepares a job description to ensure that the role fulfils the requirements of the School. This is accompanied by a person specification containing information specific to the individual role and department. The selection criteria for the role will be based on the requirements identified through the job description and the qualities and experience that the applicant(s) bring to the role in comparison with the person specification. It is these selection criteria that form the basis of fair selection.

2.3 After authorisation, vacancies will ~~usually~~ be advertised, internally and / or externally, using the best methods, as deemed appropriate, to attract and recruit the best applicant available for the position at the time.

2.4 A job description and person specification for the role are sent (made available) to applicants.

When advertising roles, we will make clear:

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

2.5 All applicants for employment will be required to complete an application form containing questions about their right to work in the UK, 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 be accepted in addition to, but not in place of, the completed application form. A short list of applicants is prepared against the selection criteria and interviews arranged using a shortlisting grid. At least 2 members of staff are involved in shortlisting.

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

2.6 An interview panel appropriate to the role will be involved in the recruitment, interview and selection process to provide reassurance, balance and objectivity to the fairness of the process. Always, one member of the panel will have completed the safer recruitment training. The interview panel will consist of at least 3 members. The HR Manager leading recruitment will undertake face to face Safer Recruitment training every 3 years.

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates, we will ask shortlisted candidates to:
- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true
- We will also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

We will obtain references before interview where the candidate has given consent. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

2.7 Interviews will be conducted in a fair and consistent manner. A written record of the interview will be kept, documenting reasons for any gaps in the employment history and

periods of employment outside of the United Kingdom to comply with standards, along with an assessment by the interviewer(s).

2.8 Once all interviews have been completed the applicants will again be reviewed against the selection criteria and a decision made. The successful applicant will initially be verbally offered the position subject to the satisfactory completion of all pre-employment checks.

### **3.0 Pre-employment checks**

3.1 Pre-employment checks can occur at different stages in the two recruitment processes, often due to logistical considerations. Many of these checks are also required for the School's volunteers and people working on behalf of the School such as the self-employed, contractors and agency staff who have frequent or intensive contact with children and young persons. They include the following:

- Successful completion of a Disclosure from the DBS at an Enhanced level (regulated activity). This will be issued to the individual who will be required to present the original Disclosure certificate to the School for verification. Failure to present the original Disclosure certificate to the School within 28 days of receipt may lead to the offer of employment being withdrawn by the School. The Disclosure certificate will state if the individual is barred from working with children and vulnerable adults. The amendments to the Rehabilitation of Offenders Act 1974 [exceptions] Order 1975 [2013 and 2020] provides that when applying for certain jobs and activities certain convictions and cautions are considered "protected". This means that they do not need to be disclosed to employers and, if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the Ministry of Justice website and on the websites of charities [NACRO](#) and [UNLOCK.](#) Further details regarding 'regulated activity' and criminal record checks are outlined in the School's Recruitment of Ex-Offenders policy and in section 4 below.
- Applicants with recent periods of overseas residence within the last 5 years or recruited from overseas are required to provide Certificates of Good Conduct or equivalent documentation from the relevant authorities alongside the Enhanced criminal records check undertaken by the School. The School recognises that the length of time to obtain a Certificate of Good Conduct varies dependent on the country. Therefore, a reasonable timeframe will be given from the Human Resources Department for each Certificate of Good Conduct and failure to provide the documentation within this timeframe may lead to a withdrawal of the offer of employment. Some countries fail to provide this document. In such cases, Bucks CC have advised that a Declaration of Overseas Criminal Record can be completed by the employee and placed on file.
- For teachers who have taught outside the UK, the school will obtain a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. It needs to be noted that some countries do not offer this information.
- Verification of identity, address and the right to work in the UK. Where an applicant has changed their name by deed poll or any other means then he/she will be required to provide documentary evidence of the change. The School also asks for the date of birth of all applicants (and proof of this) so that the School can verify the identity of and check for any unexplained discrepancies in the employment history of all applicants. The School does not discriminate on the grounds of age.

- At least two satisfactory references (one of which will be from the current or most recent employer where applicable). If the current/most recent employer does/did not involve work with children, then the second referee 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.
- All referees will be asked whether they have any reason to believe that the applicant is unsuitable for the job for which they have applied. Referees will also be asked for details of any substantiated allegations or concerns, as defined by the DfE, that have been raised (whether formally or informally) about the applicant relating to the safety and welfare of young people or under disciplinary sanctions (including expired warnings or sanctions). If the referee is a current or previous employer, they will be asked to confirm the applicant's dates of employment, salary, job title/duties, reason for leaving, performance and disciplinary record. A check will also be made on the absence record, but this will only be done once an offer of employment has been made. The School will only accept references obtained directly from the referee and will not accept 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. References are not to be used to inform the decision to appoint a candidate, but to confirm the choice made. Any unsuitability uncovered in a reference will be discussed and the offer may be reconsidered.
- Every effort will be made to verify references for successful candidates.
- Verification of qualifications and any professional status relevant to the position applied for will be obtained.
- Verification of medical fitness – the School is legally required to verify the medical fitness of applicants after an offer of employment has been made, but before the appointment can be confirmed. All applicants will be required to complete a Health Questionnaire, to be reviewed by the School medical team, in relation to the Job Description and Person Specification for the role, together with any other physical or mental requirements of the role e.g. proposed timetable, extra-curricular activities, layout of the school, etc. If the School medical team have any doubt about an applicant's fitness then the School will consider reasonable adjustments in consultation with the applicant. The School may also seek a further medical opinion from a specialist or request that the applicant undertakes a full medical assessment. In accordance with its obligations under the Equality Act 2010, no job offer will be withdrawn without first consulting with the applicant, obtaining medical advice and considering reasonable adjustments and suitable alternative employment.
- DfE records for Prohibition, General Teaching Council for England (GTCE) sanctions, Section 128 and failure of induction or probation are checked for all staff (where appropriate) before employment starts. The Education Workforce Council in Wales is checked.
- The School will also check applicants against social media platforms.

Relevant information is recorded on the Single Central Register as a live document and archived copies are held by the Headteacher's PA. This register is monitored by the Safeguarding Governor and the Headteacher

3.2 All recruitment processes within the School are detailed and held by the Head's PA and Director of Finance, HR and Resources.

3.3 Contractors engaged by the School and agencies who supply staff to the School, must complete the same checks which the School completes for its own staff where the frequency or intensive nature of the work undertaken provides them with access to children and young persons. The School requires confirmation via a letter of assurance that these checks have been completed before employees of the contractor or agency staff can commence work at the School. The School will independently verify the identity of staff supplied by agencies or contractors. This will not usually apply to delivery and emergency maintenance personnel who are supervised.

#### **4.0 Regulated activity and DBS checks**

4.1 The School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced check for regulated activity) in respect of all positions at the School which amounts to 'regulated activity' as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out the enhanced check is to identify whether any applicant is barred from working with children. 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 02:00am and 06:00am; or

Satisfies the 'period condition', meaning 4 times or more in a 30 day period; and

Provides the opportunity for contact with children.

4.2 This definition will cover nearly all posts at the School. It is for the School to decide whether a role amounts to 'regulated activity' taking into account all the relevant circumstances.

#### **5.0 Appointment of Staff**

5.1 All offers of employment are subject to the satisfactory receipt and completion of all pre employment checks.

5.2 All paperwork relating to identity, qualifications, DBS Disclosures, for unsuccessful applicants will be disposed of securely, immediately after the successful applicant has been formally confirmed. All other recruitment paperwork relating to unsuccessful applicants will be stored for a period of six months and then disposed of securely.

5.3 The successful applicant will be issued with an offer letter, terms and conditions of employment, a health declaration form and Job Description. All staff will receive the policies and procedures relating to safeguarding on commencement of their role during their induction process and relevant safeguarding training.

#### **6.0 Existing staff**

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in [relevant conduct](#); or

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

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

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **8.0 Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

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

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

We will not keep copies of such checks for longer than 6 months.

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

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

### **9.0 Trainee/student teachers**

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

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

### **10.0 Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **11.0 Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

The Chair of Governors will be subject to a DBS clearance directly from the Secretary of State.

### **12.0 Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

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

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

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

### **14.0 Dismissal**

All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must declare previous cautions and/or convictions that would be declared and not filtered on an Enhanced DBS Disclosure certificate as outlined in the School's Recruitment of Ex-Offenders Policy. Failure to disclose a previous conviction or any related information 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.

It is unlawful for the School to employ anyone who is barred from working with children. It is a criminal offence for anyone who is barred from working with children to attempt to apply for a position at the School. The School will 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; or  
It has serious concerns about an applicant's suitability to work with children

All of the above are likely to lead to an application being rejected, or a summary dismissal.

### **15.0 Recruitment on Ex-Offenders and Assessment of DBS Disclosures**

7.1 The School holds a separate policy on the Recruitment of Ex-offenders, which can be viewed on request.



### **16.0 Recruitment of volunteers/counsellors or other roles who have access to our students**

The recruitment of such personnel are subject to pre-employment checks as itemised in Paragraphs 3, 4 and 5 above. Where appropriate these personnel are also issued with a Letter of Engagement and Confidentiality Statement for agreement and signature.

### **17.0 Confidential handling of DBS Disclosure Information**

Holmer Green Senior School complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use and storage of Data.

Approved by Governors: February 2024

To be reviewed: February 2026