

# Safer Recruitment Policy

**Learning together for success and progression**

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# Safer Recruitment Policy

Trustee Committee Responsible:	HR and Governance
Nominated Lead Member of /Staff:	HR Manager / Principal
Status and Review Cycle:	Annual
Current Review:	November 2024
Next Review Date:	November 2025

## 1. Introduction

The College values the contribution of all staff and recognises that the recruitment, retention and development of appropriately skilled staff is key to the provision of a safe and successful teaching and learning environment.

The College is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff and volunteers to share this commitment. Ensuring that recruitment, selection and vetting procedures are safe, fair and consistent is an important first step to safeguarding and promoting the welfare of our students and staff.

The College seeks to deter, identify and reject candidates who may cause harm to students, or those who are otherwise unsuited to working in an environment with children and young people.

The College recognises the value of, and seeks to achieve, a diverse workforce comprising of different backgrounds, skills and abilities and is committed to equality of opportunity. Equality and Diversity data is collected through the recruitment process to identify potential sources of discrimination and to take action where required. This information is never shared with selection panels or used as part of the selection process.

## 2. Statutory Guidance

This policy meets the requirements set out in the following legislation and government guidance:

- Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges (updated annually)
- School Staffing (England) Regulations 2009
- The Equality Act 2010
- The Protection of Children Act 1999
- Safeguarding Vulnerable Groups Act 2006
- Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020
- Any guidance or code of practice published by the Disclosure and Barring Service (DBS)

### 3. Scope

This policy covers all activities that form part of the recruitment and selection process and is applicable to all staff recruitment, both teaching and support staff roles. For casual and agency staff amended selection processes may be in place however, the College will still undertake the necessary checks and steps to ensure their suitability to work with children, young people or vulnerable adults.

Godalming College, as 16-19 Academy, is classified as a 'specified place' under the Safeguarding Vulnerable Groups Act 2006. Consequently, all staff, regardless of role, will be carrying out regulated activity (Appendix 1) so an Enhanced Disclosure and Barring Service (DBS), including barred list, checks will be carried out on all prospective employees. Therefore, this policy also covers the processes for the completion of mandatory pre-employment checks for all appointments, including Enhanced DBS / barred list checks, and how the outcome of these checks are reviewed and recorded on the College's Single Central Record (SCR). It also sets out the College's approach to the checks and assurances to be sought from any agency, third party organisation or contractor providing services or individuals who will be working on College premises.

### 4. Purpose

The purpose of this policy is to:

- Ensure a consistent and equitable approach to the appointment of all staff and that recruitment and selection activities are undertaken in a professional and timely manner
- Ensure that all relevant equal opportunities legislation is adhered to and that applicants are recruited without regard to gender, gender reassignment, sexual orientation, marital or civil partnership status, colour, race, nationality, ethnic or national origins, religion or belief, age, pregnancy or maternity leave
- Support a culture that safeguards and promotes the welfare of children, young people and vulnerable adults by ensuring robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities
- Ensure that appointments are based on merit and that successful applicants possess the most appropriate blend of qualifications, experience, knowledge, skills and abilities when considered against the criteria of the vacant post
- Ensure that the most cost effective use is made of resources in the recruitment and selection process and that there is minimal disruption to continuity in teaching and support of students and provision of other key services

### 5. Responsibilities

The Board of Trustees is responsible for the recruitment and appointment of the Principal. The Principal, in conjunction with the Board of Trustees, is responsible for the recruitment and appointment of the Senior Leadership Team (SLT). Approval to undertake any staff recruitment must be given by a member of SLT who are responsible for the recruitment of all staff.

The HR department are responsible for the management and administration of the recruitment and selection process. The HR department are also responsible for undertaking all legislative and statutory pre-employment checks. The Director of HR is responsible for reviewing the outcome of these checks, recording these on the College's Single Central Record (SCR) and flagging any concerns to the Principal.

At least one member of the recruitment and selection panel making the decision to appoint must have undertaken Safer Recruitment training in the last 3 years. The HR department holds a record of staff that have

completed Safer Recruitment training and the recruitment records for each post should highlight the lead individual on each panel.

Any staff involved in the recruitment process must be familiar with, and comply with, this policy. Staff involved in the recruitment and selection process must declare any close personal relationship with a candidate as soon as they are aware of an application so their continued involvement and any conflict of interest can be considered.

The College takes the control and processing of employee data very seriously and is committed to acting in line with the General Data Protection Regulations when processing candidate and employee data. Links to the privacy notice and Data Protection Policy are on the 'Working with Us' section of the College website. The HR department are responsible for ensuring all data collected in the course of recruitment is held securely, used and retained only for the period necessary.

## 6. Stages in the Recruitment and Selection process

### 1. Identifying a vacancy

When a vacancy occurs, either as a replacement for a leaver or a proposal for a new post, SLT will undertake a review, taking into account the following:

- Whether it is necessary to fill the post
- Whether any changes of duties or responsibilities should be considered, including whether changing work patterns, organisation or technology mean the role has evolved or the work can be distributed in a different way
- The nature of the post and how it is best filled for example by full time, part time, permanent or temporary working or by an arrangement with an employment agency

### 2. Advertising

SLT in conjunction with the HR department will decide the most appropriate method for advertising a vacancy. The College practice is that internal and external vacancies will be advertised on the Principal's noticeboard and emailed to all staff. External vacancies will also be advertised on the College website and the S7 Consortium of Sixth Form Colleges website. A decision will be made as to where else to advertise a role depending on the particular skills, experience or qualifications required or whether recruitment difficulties are anticipated. This will have the objective of securing applications from the best qualified candidates balanced with the cost effectiveness in each case.

In certain circumstances a post or promotion opportunity will be protected for current staff and only advertised internally in the first instance.

Occasionally the decision may be taken not to advertise a post. This may occur, for example, when a similar post has been recently advertised and an appointment can be made from the subsequent interviewees, or because a temporary appointment needs to be made as soon as possible to ensure continuity within a post.

The 'Working for Us' page on the College website, where all external vacancies will be advertised, will have the following safeguarding statement.

'Godalming College is committed to equality of opportunity and to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff and volunteers to share this

commitment. Therefore, shortlisted candidates must complete a full College application form, may be subject to online searches and are required to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Furthermore, there is a requirement for all successful candidates to apply for an Enhanced Disclosure and Barring Service disclosure (DBS) in addition to referencing and qualification checks.'

Application forms will also highlight the College's uncompromising commitment to the safeguarding of its students.

### **3. Applicant Pack and Application form**

An information pack will be created for all posts, which will be placed on the College website, and other platforms where the vacancy is advertised, and made available electronically or in hard copy for all interested parties. The information pack will usually consist of:

- A letter from the Principal
- Academic Subject Information or Support Staff Department Information
- Job Description and Person Specification
- Specific information on the terms and conditions relating to the post (hours, pay scale, salary etc.) and details of the recruitment process (closing date and proposed interview dates)
- General information on Working at Godalming College and benefits
- Application form, including an equality monitoring form
- Information about the recruitment process
- Signposting to relevant policies such as Child Protection and Safeguarding, Equality, Diversity and Inclusion, Data Protection and the privacy notice, on the College website

The Manager responsible for the recruitment process must ensure that all the necessary supporting documentation is ready for the job pack in a timely manner, this will include department information, an up to date job description and person specification. The job description will describe the duties, responsibilities and level of seniority associated with the post, whilst the person specification will describe the type of qualifications, training, knowledge, experience, skills and competencies required for the effective performance of the job. All job descriptions should include a specific reference to safeguarding responsibilities.

Applicants will be required to complete the application form in full and sign to confirm the accuracy of the personal details they have submitted. This is to ensure receipt of all relevant information (including DfE reference number and QTS/QTLS status where appropriate), educational and employment history and general suitability for the respective post as outlined in the job description in a consistent and comparable format to aid short-listing. Candidates are required to account for any gaps or

discrepancies in their employment history. The application form will also capture details of referees and whether a candidate is related to an existing Senior Manager or Trustee of the College.

Candidates are required to complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children. It is unlawful for the College to employ anyone that is barred from working with children, and it is a criminal offence for any individual who is barred from working with children to apply for a position. Candidates are informed within the application form that providing false or misleading information may result in the rejection of their application or dismissal from employment.

CVs are not usually accepted in place of an application form, unless a reasonable adjustment has been made to accommodate the needs of an applicant with a disability. Where a decision to shortlist based on CVs only is made, an application form and self-declaration form must be completed in full before an interview takes place.

Applications received after the closing date will not be considered, unless the applicant has given prior notice of a late application and the recruitment and selection panel has agreed this.

#### **4. Short Listing**

Short-listing will be based on the requirements of the job description and person specification and will usually be conducted by a panel of a minimum of two individuals. A short-listing matrix will be completed to justify decision-making and ensure consistent treatment of all candidates. This matrix will be retained, in the HR department for 6 months, to evidence short-listing decisions.

Short-listed candidates may now be subject to an online search and are notified of this as they are invited to interview. This is to identify any issues or incidents involving the candidates, or anything that they may have said or done that could harm the College's reputation or make the candidate unsuitable to work with children. When an online search is to be conducted, the following parameters will apply:

- Only members of the HR department will conduct an online search. This is to ensure that the search is carried out by an individual who is trained in safer recruitment and has appropriate knowledge of their responsibilities under equality and data protection legislation. This will also minimise the risk of discrimination and/or unconscious bias as they are not directly involved in the selection process
- The focus of the online search will be on information that is in the public domain through familiar search engines and websites and will usually be limited to a review of the first two pages of search results
  - The starting point will be a name search in Google or alternative search engine. Where multiple individuals appear in a name search, the name should be combined with the name of their previous employer or town/city of residence with care taken to identify the correct individual
  - A specific search will be made of teacher misconduct panel outcomes
  - This may be followed by a review of a limited number of social media accounts such as LinkedIn, Instagram, Facebook, X (formerly Twitter) and Tik Tok as appropriate
- Online searches will be conducted before interviews take place in order that any identified incidents or issues can be explored further with candidates as necessary
- Only information that is relevant or poses a genuine risk to the College, its students and/or its reputation will be passed to the selection panel. Red flags include content that indicates inappropriate behaviour, discrimination, drug or alcohol misuse and inappropriate photos or videos

If an online search does not reveal any relevant information, then it is not necessary to retain the search results. However, a note will be kept with the candidate's application containing details of the date of the search, the process undertaken, by whom and the results to demonstrate compliance with KCSiE. If relevant information is revealed the candidate will be informed and the results of the online will be discussed with them at interview. A record of this further discussion and any decision made in respect of it will be kept with the candidate's application form.

## **5. Selection Process**

The selection process will be dependent on the requirements and seniority of the respective role. It will always include a structured interview based on the requirements outlined in the job description and person specification. In the interests of fairness and parity, the selection panel will ensure that all candidates are asked the same main questions at interview, although supplementary questions may differ according to the candidates' answers and backgrounds. Selection panels should include a diverse range of individuals wherever practicable and must include at least one member experienced and trained in the areas of equal opportunities and the principles of safer recruitment.

Significantly, in terms of safer recruitment, at least one question will be asked to explore attitudes to safeguarding and working with young people or vulnerable adults. Additionally, the selection process may include presentations, teaching observations and role specific exercises or tasks related to the performance of the role.

The HR department will contact short-listed candidates to arrange the next steps in the selection process and they will receive full details of the selection activities in writing when invited to the selection event. All candidates will be asked, in accordance with the Equality Act 2010, if they require any particular arrangements or reasonable adjustments so that they can participate fully in the selection process. Candidates will be asked to bring documentation to verify their identity, eligibility to live and work in the UK and to confirm their educational and professional qualifications when they attend the selection process.

The HR department will retain interview notes, observations or task submissions for 6 months. Feedback will be available to any candidate on request and will be delivered by a member of the selection panel.

At some selection events, particularly for teaching appointments, candidates will ordinarily receive a verbal outcome at the end of the interview day or the following day wherever possible. When this is not possible, the aim is to share the outcome within two working days or advise candidates if there is going to be a further delay.

## **6. References**

The purpose of references is to verify the information listed on the application form and to obtain objective and factual information to support the selection decision. In line with DfE guidance, references should also include a declaration from the referee that the candidate is suitable to work with children. When a listed referee works in an educational establishment, the Head Teacher/Principal must confirm the reference as accurate in respect to disciplinary investigations and safeguarding.

All appointments are subject to the receipt of two satisfactory references, one of which must be from the candidate's current or most recent employer. Ideally, references should be the last two employers, unless the most recent employment did not involve work with children. If a candidate has experienced a period of unemployment, they should confirm the reason for this break in their employment history, including leaving reasons, and provide contact details for their last employment period. In some circumstances, it may be appropriate to obtain more than two references and to contact a previous employer not listed as a referee by the candidate. In the unlikely event that a candidate had not previously been employed or undertaken any voluntary unpaid work, a character reference could be listed for consideration, i.e. college/university tutor, PTA chair etc.

For teachers, and any other appropriate posts, where the candidate has given their express permission, HR will seek to obtain references for those who are shortlisted in advance of the selection process. Where this has not been possible, any offer of employment will remain provisional until the receipt of satisfactory references.

The approach taken when obtaining references is to write directly to the referees listed by the candidate and only make telephone contact if any additional clarity is required or where there is no response. The College has a standard reference template and asks referees to confirm the following information:

- How long they have known the candidate and in what capacity
- Their current post and salary
- Their suitability for the post as outlined in the job description and person specification attached (including reference to their performance history and conduct as well as the level of student achievement and other relevant examination results)
- Details of any disciplinary procedures they have been subject to in which the disciplinary sanction is current or involving the welfare of children including anywhere the sanction has expired
- Details of any allegations or concerns that have been raised relating to the welfare of children and the outcome of these
- Details of any allegations or concerns that have been raised relating to extremism or vocal or active opposition to fundamental British values (Prevent duty)

References or testimonials provided by the candidate are never accepted. Open references such as 'To whom it may concern' will not be accepted if they fail to include dated evidence or are without obvious organisational authorisation.

If there are three unsuccessful attempts to obtain the reference (including telephone contact with an appropriate representative at the establishment) and the candidate is unable to gain support from the referee to engage with the process, it may be appropriate to consider contacting an alternative referee.

In the event that two references cannot be secured, the HR department will complete a form detailing the reference information that has been received, the steps that have been taken to follow up the outstanding referees, and the outcome of all other pre-employment checks. Based on this information, the Principal will make a decision as to whether the candidate can commence employment or, in the event that they have already started, whether their employment can continue. This form must then be kept on the employee's file.

## **7. Pre-employment checks**

In addition to references, offers of employment are conditional upon the pre-employment checks listed below. The HR department must, for all candidates:

- Confirm their identity and verify their right to work in the UK, using the checking guidelines on the gov.uk website and retaining a photocopy of the original evidence provided. The College will not employ any individual, regardless of their colour, apparent race, nationality or ethnic origins who cannot demonstrate they have the right to work in the UK. The College is not currently licensed to sponsor candidates who require a visa to work in the UK
- Obtain an Enhanced DBS certificate, including barred list information for those who will be engaged in regulated activity, as defined by the KCSiE guidance (Appendix 1)
- Confirm their mental and physical fitness to carry out their work responsibilities and work alongside young people through the College's Occupational Health Service
- Verify any professional qualifications, including the award of qualified teacher status and the completion of teacher induction



- For teachers, check that they are not subject to a teaching prohibition order, including any sanction or restriction imposed that remains current
- For managers, or those with budgetary responsibility, check that they are not prohibited from being involved in the management of a school via a Section 128 check
- Carry out further checks as appropriate, for any candidates who have lived or worked outside the UK, including where relevant any teacher sanctions or restrictions imposed by another Country and criminal record checks or their equivalent. Following the UK's exit from the EU, it has been confirmed that this includes individuals from EEA countries

The outcomes of these checks must be recorded on the HR database for inclusion on the SCR and on the employee's file.

## **8. Offers of Employment**

Successful candidates will be offered the post verbally, followed by an offer letter as soon as possible afterwards. The offer of employment by the College and acceptance by the candidates is binding on both parties, subject to the satisfactory pre-employment checks already outlined.

Offers of employment will be withdrawn where:

- A candidate is found to be on the Children's Barred List, or the DBS check shows that that they have been disqualified from working with children
- A candidate has provided false information in, or in support of their application
- There are serious concerns about an applicant's suitability to work with children

The Principal will review the information, communicate the decision to the candidate and document this on the candidate's file. The facts will also be reported to the DBS, Local Authority Designated Officer (LADO) and/or the Police as appropriate.

If a candidate challenges the decision to withdraw an offer of employment a paper review will take place by the Chair of Trustees, within 5 working days or as soon as reasonably practical, and the candidate will receive confirmation in writing. There will be no further right of appeal.

## **9. Induction**

All new members of staff will have a comprehensive induction that will include a specific session on safeguarding and will be required to read the College's policies on Child Protection and Safeguarding and Whistleblowing among others. Employees are required to sign to say they have read and received key policies and procedures. There is a probationary period in place for all roles which is then followed up by ongoing annual appraisal and mandatory safeguarding training.

## **7. Disclosure of Convictions**

The College, as an organisation assessing candidate's suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the DBS, complies fully with the DBS Code of Practice. The College uses Strictly Education 4s to process their DBS checks and their policy statement on the recruitment of ex-offenders is available to all candidates upon request.

The College encourages candidates to provide details of any convictions at the earliest stage in the application process via the application form. This information should be sent to HR separately and will only be shared with those who need to see it as part of the selection process. The College is committed to treating all candidates fairly, and this includes candidates who have a criminal record, and undertakes not to discriminate

unfairly against any candidate on the basis of a conviction or other information revealed either voluntarily or in the course of a criminal record check.

In the event that candidates disclose any convictions on the application form, or any are returned on the DBS certificate, due consideration will be given to the Rehabilitation of Offenders Act 1974 and the following criteria:

- Date of the offence
- Details of the offence, seriousness and relevance
- Isolated incident or history of offences
- Change in circumstances

Where it is necessary to establish further facts, including any relevant mitigation, a meeting will take place with the candidate. This open and measured discussion will be held with the Director of HR or the Assistant Principal for Safeguarding and Support. After full consideration of all the information, and a risk assessment surrounding the role for which the candidate is applying, the Principal will make a decision and document this on the candidate's file.

## 8. DBS Checks

The DBS check forms one part of a wider safer recruitment process and members of staff would not normally be able to start in post without a satisfactory check having been received. However, the College may allow employment to commence, where a DBS has been applied for but not yet received, if:

- Right to work and identity checks have been completed; and
- References have been received; and
- Appropriate supervision is in place and a risk assessment has been signed off by the Principal

Newly appointed staff awaiting the outcome of a DBS check must not be left unsupervised with young people or vulnerable adults and must always be in sight or hearing of a fully checked member of staff. The risk assessment will confirm that the following safeguards are in place:

- No 1 to 1 working with students
- No working in isolated parts of the building where activities with students cannot be overseen or overheard by a third party (it may be decided for example to insist the door to a classroom is kept ajar)
- No participation in off site or residential trips and visits

and detail how the newly appointed member of staff will be supervised at all times whilst in College. Staff requiring supervision will be required to wear a red lanyard, until receipt of the DBS check, to identify that supervision is required. Anyone with a red lanyard found unaccompanied must be returned to reception immediately.

The College can, at its discretion and with consideration to the role and risk, accept an existing DBS if:

- The DBS disclosure was carried out for an equivalent role and is at the same level as required for their role at the College e.g. Enhanced with Children's Barred List check; and
- The DBS disclosure is not more than three months old; and
- There is no break of service of three months or more; and
- The original DBS certificate can be provided along with proof of identity

Or

- The candidate is registered with the DBS Update Service; and
- The original DBS certificate can be provided along with proof of identity; and

- The candidate consents to the College performing an Update Service Check

DBS certificates are sent directly to the individual's home address. All staff are required to bring in the original copy of their DBS certificate on receipt so the information can be checked by HR. DBS certificates are not retained by the HR department however copies may be taken in order to ensure the unique reference number and date are correct on the SCR or in order to process an Update Service Check. The College will comply with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of DBS certificates.

It is the College's policy that once a satisfactory DBS check has been undertaken and the member of staff maintains continuity of service, then no rechecking will be undertaken as long as there is no cause for concern. One exception to this is Invigilators and other casual members of staff who are required, due to the ad-hoc nature of their attendance at College throughout the year, to be in the Update Service and a check is performed before each exam season or period of work.

If any concerns do arise in respect of an existing employee's suitability to work with children and young people, relevant checks will be undertaken as if the individual was a new member of staff.

## 9. Single Central Record

The College will maintain a Single Central Record of recruitment and vetting checks, in line with DfE requirements. This includes the unique reference number and date of issue of the DBS check as well as evidence to support checks on identity, right to work, professional qualifications, prohibition from teaching and standalone barred list checks. This is in addition to individual HR files and is held securely on a central spreadsheet accessed only by the HR department. The Director of HR is responsible for maintaining the SCR, ensuring that details are recorded accurately, and starters and leavers are added or removed in a timely manner. The SCR is formally reviewed monthly by the Director of HR, termly by the Designated Safeguarding Lead and annually by the Safeguarding Link Trustee. It is also subject to random checks by members of the Senior Leadership Team.

The SCR contains details of checks on;

- All staff who are employed to work at the College, whether on a permanent, temporary or casual basis
- All others who have been chosen by the College to work in regular contact with students, categorized as External Student Support. This covers individuals brought into the College to provide additional teaching, instruction and support to students. This includes but is not limited to agency staff, specialist sports coaches, peripatetic music tutors, counsellors, career advisers, and volunteers
- All others who regularly work on the College site providing services to the College, but not engaged in regulated activity, where contact with students is possible. This includes but is not limited to contractors providing cleaning, gardening, building, or maintenance services

## 10. Existing Staff Members

All members of staff are expected to disclose, in writing to the Principal, any offence for which they receive a conviction or caution during their employment with the College. Failure to do so may result in disciplinary

action being taken. A risk assessment will then take place to determine whether there are any issues in terms of ongoing employment and undertaking regulated activity with children and young people. It may be necessary to invite the employee to a formal meeting to discuss the disclosure and any points that require clarification. A formal record will be made of all correspondence involved in the decision making process and this will be confidentially stored in HR.

There is a statutory requirement within the Protection of Children Act 1999 that, members of staff who are dismissed, who resign in circumstances which may have led to dismissal or have been transferred as a result of a disciplinary on the grounds of misconduct which harmed or placed a child a risk of harm, must be referred to the LADO, the Teaching Regulation Agency (TRA) and the DBS.

## 11. Managing Other Workforce Groups

The information below should be read in conjunction with the KCSiE flowchart and guidance in Appendix 2.

### **Trainee Teachers**

If the individuals are part of the College workforce, and paid via the payroll, then the pre-employment checks should be undertaken in the usual manner. Where the College is providing a placement, and the individual is not a member of staff, written confirmation from the third-party training provider is required to confirm that all the necessary safer recruitment checks that the College would ordinarily complete have taken place. Additional identity verification will also take place when the individual attends College for the first time.

### **Casual Staff**

Any individual employed on a casual or green claims contract remains subject to all of the outlined pre-employment checks before they are authorised to undertake any work within College. It is further recommended that, where employment is periodic throughout the year such as with exam invigilators, that the individual joins the Update Service to allow the DBS to be checked in cases where there has been a significant break from College. The College will reimburse the Update Service fee where this is required.

### **External Student Support Staff**

When the College employs staff via a third-party agency or organisation it must obtain written confirmation that all the necessary safer recruitment checks that the College would ordinarily complete have taken place. Additional identity verification will take place when the individual attends work for the first time to ensure that the individual presenting themselves for work is the same individual on whom the checks were made. In the event that an Enhanced DBS check includes a disclosure, the College must obtain a copy of the certificate from the agency, prior to commencement, in order to fully consider the implications.

If a self-employed individual works within College and undertakes regulated activity, as they are unable to make an application for an Enhanced DBS check with barred list check, directly to the DBS, the College will make this on their behalf and transfer this charge to the individual at their discretion. As with agency staff, additional identity verification will also take place when the individual attends work for the first time. Where the College makes such an application the certificate must be entered into the Update Service to allow regular checks to be performed throughout their association with the College.

### **Volunteers**

It is acceptable to treat individuals performing ad-hoc voluntary work in the same way as a regular visitor, providing that they are constantly supervised and do not undertake any regulated activity with children or young people. Any regular volunteers, however, should be subject to an Enhanced DBS check.

### **Governance**

In 2016, the Government issued legislation making it compulsory for all individuals involved in educational governance to have Enhanced DBS checks. Trustees only need to have a barred list check if they would also engage in regulated activity in addition to their governance duties. Additionally, it should also be confirmed that relevant individuals are not subject to a Section 128 direction made by the Secretary of State, as this would prohibit or restrict an individual from taking part in the management of an independent school, including academies and free schools.

### **Contractors**

On site contractors are subject to the appropriate level of DBS check and the College must obtain written confirmation that all of the necessary safer recruitment checks that the College would ordinarily complete have taken place. If the guidance deems a basic DBS check appropriate the contractor will remain supervised at all times if they have access to children and young people.

### **Visitors**

SLT are responsible for ensuring that all staff understand the importance of registering visitors and providing appropriate supervision at all times. Staff should make Reception aware if they are expecting visitors, providing full details as to who they are, their reason for visiting and expected time of arrival. Reception staff within College are responsible for registering visitors, ensuring appropriate ID checks take place and issuing temporary visitor lanyards. Visitors from other known institutions, such as the Waverley Federation Schools and S7 Colleges can, on presentation of their ID and work place lanyard, be signed in and do not require supervision. In some circumstances, regular visitors may need an appropriate DBS check and/or confirmation from the visitor's employer that their staff have undertaken appropriate checks.

### **Lettings**

When the College premises are hired, assurances should be sought from the body providing the service or activity that there are appropriate safeguarding and child protection policies and procedures in place and that these are subject to regular scrutiny and inspection. Safeguarding arrangements are now subject to formal review in any transfer of control agreements as a condition of the use of College premises, with failure to comply leading to the agreement being terminated.

In order to determine the correct checks are in place requests for placements and voluntary support must be discussed in advance with the HR department.

## **12. Appendices**

1. Regulated Activity pg 66 KCSiE 2024
2. Flowchart of Disclosure and Barring Service Criminal records checks and barred list check pg 70 KCSiE 2024