



## **NORFOLK HOUSE PREPARATORY SCHOOL, PRE- PREP and Montessori House Nursery**

### **Safe Recruitment:**

This policy applies to all pupils in the school, including in the EYFS and covers procedures expected of staff working with children at both sites

Year 1-6, 10 Muswell Ave, London N10 2EG  
EYFS - 5 Princes Ave, London N10 3LS

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## SAFE RECRUITMENT

The safe recruitment of staff in Schools is the first step to safeguarding and promoting the welfare of children in education. Norfolk House School, Norfolk House PrePrep and Montessori House Nursery is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. 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 recognises the value of, and seeks to achieve a diverse workforce, which includes people from different backgrounds with different skills and abilities. The School is committed to ensuring that the recruitment and selection of all who work within the School is conducted in a manner that is systematic, efficient, effective and promotes equality of opportunity. This document provides a good practice framework to comply with the principles set down in the School's Equality Policy.

The aims of the School's recruitment policy are:

- To ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (**DFE**), *Keeping Children Safe in Education 2014* and any advice published by the Disclosure and Barring Service (**DBS**);
- 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.

Norfolk House School and Montessori House Nursery recognises the importance of following recruitment and selection procedures on the appointment of employees and volunteers, which help to deter, reject or identify people who might abuse children, or are otherwise unsuited to work with them. Recruitment procedures are carried out in accordance with guidance given in 'Keeping Children Safe in Education (2014) (KCSIE) – see Appendix A

To ensure safer recruitment, the procedures are designed to:

- Scrutinise applicants
- Verify identity
- Verify academic or vocational qualifications
- Obtain professional and character references ideally prior to interview
- Check previous employment history
- Ensure that a candidate has the health and physical capacity for the job
- Incorporate a face to face interview
- Include a Disclosure and Barring Services (DBS) check
- Undertake a prohibition order check (for those staff working in a teaching capacity\*)
- Check a person's right to work in the UK

- Where a prospective employee has lived or worked overseas, undertake such checks as are equivalent to the DBS check in the relevant country/ies, as required.
- Maintain a record in the Central Register of Appointments to demonstrate that the above checks have been undertaken.
- this includes coaches, teaching assistants, peripatetic staff etc.
- Follow through a checklist from application to start of appointment at the school to ensure all safe recruitment checks and procedures are undertaken to safeguard pupils.

These procedures apply to all adults who may undertake a regulated activity (unsupervised) with the children in either a paid or voluntary capacity. The school will verify that child protection checks and procedures listed above have been successfully undertaken for all staff employed by another organisation and who work with the school's pupils either at the school or on another site. This applies, for example, to staff at a swimming pool or an outward bound activity centre and to visiting staff running activities or undertaking sports coaching, even where such staff are paid directly by the parents.

### **Interviews**

The selection process will include the following:

- a face to face professional interview including a question related to safeguarding children; and
  - an activity with children, as appropriate
- All recruitment will be undertaken with at least one member of the panel having undertaken Safer Recruitment Training.

Questions will be agreed in advance by the panel

The panel will undertake a regular review of safer – recruitment procedures

### **Staff training on Safe Recruitment:**

Key staff involved in the recruitment of new personnel have undertaken Safe Recruitment training. This must be renewed every 5 years:

Head Teacher: Samantha Habgood	March 2016
Deputy Head: Elizabeth Burke	October 2017
Assistant Head Teacher: Elissa Ellison	August 2017
Head's PA: Kirsty Mardell	October 2017

Certificates of qualification are available in the school office.

Once appointed, staff will be asked to sign an annual form that nothing has changed to their DBS status within the previous 12 months.

## **Appendix A**

### **Extracted from Keeping Children Safe in Education 2014 DFE Publication**

#### **Part three: Safer recruitment**

##### **Recruitment, selection and pre-employment vetting**

46. It is vital that schools and colleges create a culture of safe recruitment and adopt recruitment procedures that help deter, reject or identify people who might abuse children. This part of the guidance describes in detail those checks that are, or may be, required for any individual working in any capacity at, or visiting, the school or college. Governing bodies and proprietors must act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence including: criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information.

47. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in a school or college, as outlined in this guidance.

48. For most appointments, an enhanced DBS check with barred list information will be appropriate as the majority of staff will be engaging in regulated activity. A person will be considered to be in 'regulated activity' if as a result of their work they:

- will be responsible, on a regular basis, in any setting for the care or supervision of children; or
- will regularly work in a school or college at times when children are on school or college premises (where the person's work requires interaction with children, whether or not the work is paid (unless they are a supervised volunteer), or whether the person is directly employed or employed by a contractor); or
- in a college, will regularly come into contact with children under 18 years of age.

49. In a school or college a supervised volunteer who regularly teaches or looks after children is not in regulated activity. The Department for Education (DfE) has published separate statutory guidance on supervision and regulated activity which schools and colleges should have regard to when considering which checks should be undertaken on volunteers.

#### **Regulated activity**

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government have produced a factual note on [Regulated Activity in relation to Children: scope](#).

#### **Regulated activity includes:**

a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children,

b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers;

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

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

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

50. In addition to the DBS checks described, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching. See the pre-appointments section which follows.

## **Types of check**

### ***Disclosure and barring service*** (DBS checks)

51. The DBS is responsible for administering three types of checks (see Annex E for more information):

- Standard: a check of the Police National Computer (PNC) records of convictions, cautions, reprimands and warnings;
- Enhanced: a check of the PNC records as above, plus other information held by the police that is considered relevant by the police; and
- Enhanced with barred list information: for people working in regulated activity with children. This adds checks of the DBS Children's Barred List to the enhanced check.

More information is available on the DBS website.

52. When the DBS has completed its check of an applicant's PNC record and, if appropriate, whether or not they are on the barred list, the relevant information will be recorded on a certificate (the DBS certificate) that is sent to the applicant. The applicant must show the DBS certificate to their potential employer before they take up post or as soon as practicable afterwards. If a school or college allows an individual to start work in regulated activity before the DBS certificate is available then they should ensure that the individual is appropriately supervised and that all other checks, including a separate barred list check, have been completed.

53. If a school or college knows or has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form of regulated activity. There are penalties of up to five years in prison if a barred individual is convicted of attempting to engage or engaging in such work.

Secretary of State Prohibition Orders

54. Prohibition orders prevent a person from carrying out teaching work in schools, sixth form colleges, 16 to 19 academies, relevant youth accommodation and children's homes in England. A person who is prohibited from teaching must not be appointed to work as a teacher in such a setting. A check of any prohibition can be carried out using the Employer Access Online Service. Prohibition orders are

described in the National College for Teaching and Leadership's (NCTL) publication Teacher misconduct: the prohibition of teachers.

55. Prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by NCTL. Pending such consideration, the Secretary of State may issue an interim prohibition order if he considers that it is in the public interest to do so.

### **Pre-appointment checks**

#### ***All new appointments to regulated activity***

56. An offer of appointment to a successful candidate, including one who has lived or worked abroad, must be conditional upon satisfactory completion of pre-employment checks.

57. When appointing new staff, schools and colleges must:

- verify a candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available;
- obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity;
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service;
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website;
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate (see relevant sections below); and
- verify professional qualifications, as appropriate.

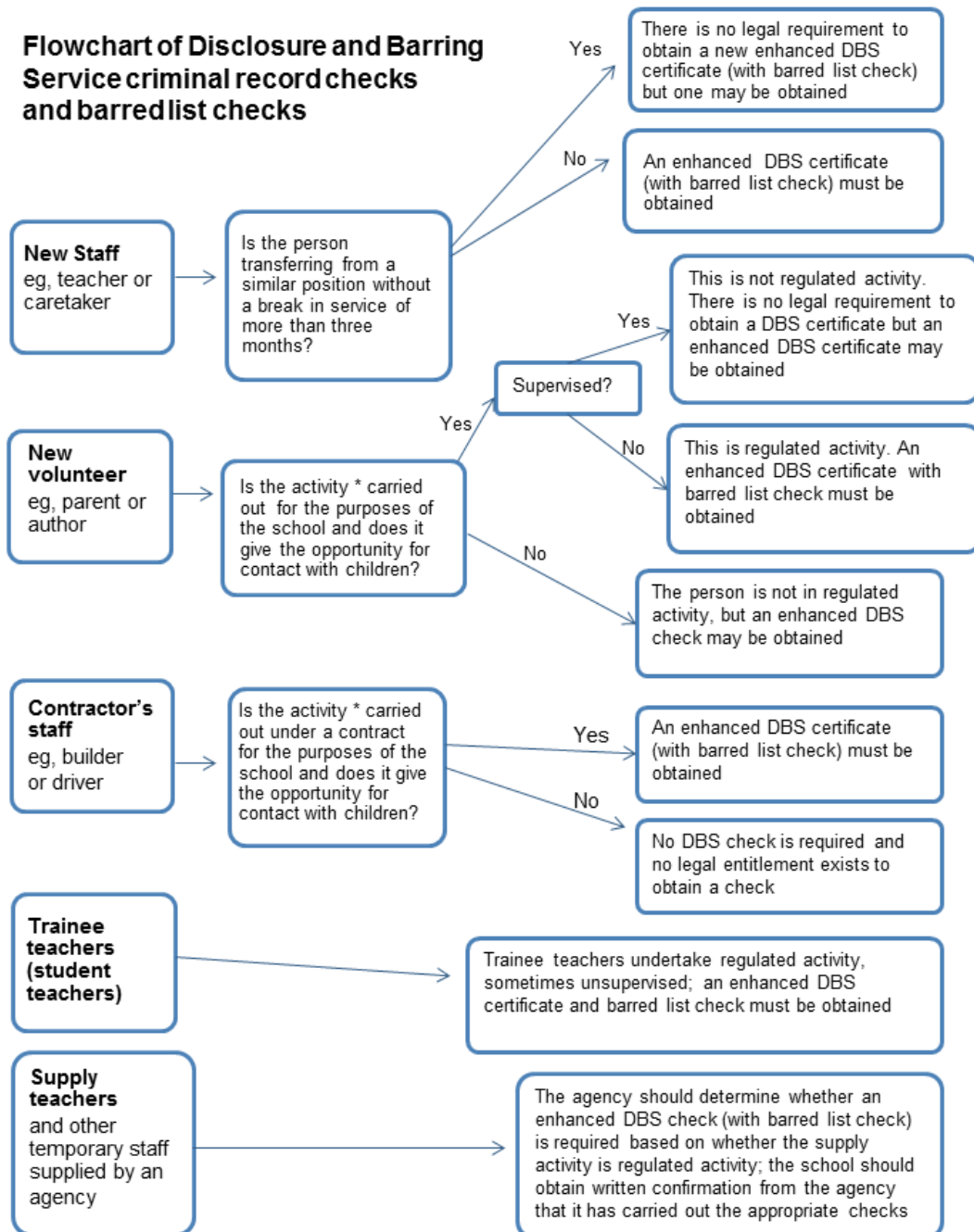
58. A DBS certificate must be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the school or college may undertake an online update check through the DBS Update Service. Individuals can join the DBS Update Service when applying for a new DBS check; this will allow them to re-use this check when applying for similar jobs. With the individual's consent, their employer can go online and carry out a free, instant check to see if a new certificate is required: [www.gov.uk/dbs-update-service](http://www.gov.uk/dbs-update-service).

59. There is no requirement to obtain an enhanced DBS check if, in the three months prior to beginning work in their new appointment, the applicant has worked:

- in a school in England in a post which brought them into regular contact with children or in any post in a school since 12 May 2006; or
- in a college in England in a position which involved the provision of education and regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18.

But a school or college may request an enhanced DBS check with barred list information should there be concerns and bearing in mind the duty schools and colleges are under not to allow a barred person to work in regulated activity.

60. A school or college may not request an enhanced DBS check with barred list check for anyone working in the school or college who is not in regulated activity, but may request an enhanced DBS check without a barred list check.



\* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'

## Employment history and references

61. Employers should always ask for written information about previous employment history and check that information is not contradictory or incomplete. If a candidate for a teaching post is not currently employed as a teacher, it is also advisable to check with the school, college or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

62. The purpose of seeking references is to obtain objective and factual information to support appointment decisions. References should always be obtained, scrutinised and any concerns resolved satisfactorily, before the appointment is confirmed. They should always be requested directly from the referee and employers should not rely on open references, for example in the form of 'to whom it may concern' testimonials.

63. Ideally, references should be sought on all short-listed candidates, including internal ones, before interview, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview.

64. On receipt, references should be checked to ensure that all specific questions have been answered satisfactorily. The referee should be contacted to provide further clarification as appropriate: for example if the answers are vague. They should also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies should be taken up with the candidate.

65. Any information about past disciplinary action or allegations should be considered carefully when assessing the applicant's suitability for the post (including information obtained from the Employer Access Online checks referred to previously).

### **Single central record**

66. Schools and colleges must keep a single central record, referred to in the regulations (described in the following paragraph) as the register. The single central record must cover the following people:

- all staff (including supply staff) who work at the school: in colleges, this means those providing education to children;
- all others who work in regular contact with children in the school or college, including volunteers; and
- for independent schools, including academies and free schools, all members of the proprietor body.

Generally, the information to be recorded on these individuals is whether or not the following checks have been carried out or certificates obtained, and the date on which the checks were completed:

- an identity check;
- a barred list check;
- an enhanced DBS check;
- a prohibition from teaching check;
- further checks on people living or working outside the UK;
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

67. For details of records that must be kept, see:

- for maintained schools: Schedule 2 to the School Staffing (England) Regulations 2009 and the School Staffing (England) Amendment Regulations



2013 for pupil referral units through the Education (Pupil Referral Units) (Application of Enactment) (England) Regulations 2007

- for independent schools, (including academies and free schools and alternative provision academies and free schools): under the Education (Independent School Standards) (England) Regulations 2010, as amended by the Education (Independent School Standards) (England) (Amendment) Regulations 2012
- for colleges: the Further Education (Providers of Education) (England) regulations 2006
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Schools and colleges do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. To help schools and colleges comply with the requirements of the Data Protection Act, where a school or college chooses to retain a copy they should not be retained for longer than six months. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept for the personnel file.

### **Individuals who have lived or worked outside the UK**

68. Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. In addition, schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered.

69. Advice on the criminal record information, which may be obtained from overseas police forces, published by the Home Office, is on GOV.UK. The Department for Education has also issued guidance on the employment of overseas-trained teachers. This gives information on the requirements for overseas-trained teachers from the European Economic Area to teach in England, and the award of qualified teacher status for teachers qualified in Australia, Canada, New Zealand and the United States of America.

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

70. Schools and colleges must obtain written notification from any agency, or third-party organisation, they use that the organisation has carried out the checks on an individual who will be working at the school or college that the school or college would otherwise perform. This must include, as necessary, a barred list check, prior to appointing that individual. They must also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Trainee/student teachers**

71. Where applicants for initial teacher training are salaried by the school or college, the school or college must ensure that all necessary checks are carried out. As trainee teachers can undertake regulated activity, sometimes unsupervised, an enhanced DBS certificate and barred list check must be obtained. Where trainee teachers are fee-funded it is the responsibility of the initial teacher training provider to carry out the necessary checks.

### **Existing staff**

72. If a school or college has concerns about an existing staff member's suitability to work with children, the school or college should carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the school or college moves from a post that was not regulated activity, into work which is regulated activity, the relevant checks for the regulated activity must be carried out. Apart from these circumstances, the school or college is not required to request a DBS check or barred list check.

73. Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have National College for Teaching and Leadership - Initial teacher training provider supporting advice and initial teacher training criteria

Schools will wish to consider the offence of allowing individuals to engage in regulated activity whilst barred. It is intended that, at a date to be announced, schools (as a regulated activity provider) will be under a duty to request a barred list check before allowing any individuals to engage in regulated activity (section 34ZA Safeguarding Vulnerable Groups Act 2006) and for it to be possible to obtain such a check independently from the enhanced check from the DBS.

74. Where a teacher's employer, including an agency, ceases to use the services of a teacher because of serious misconduct, or would have dismissed them had they not left first, they must consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

Volunteers

75. Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

76. For new volunteers in regulated activity who will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis schools and colleges must obtain an enhanced DBS certificate with barred list check.

77. For new volunteers not in regulated activity schools and colleges should obtain an enhanced DBS certificate.

78. For existing volunteers who provide personal care, the school or college should consider obtaining an enhanced DBS certificate with barred list check.

79. For other existing volunteers who are unsupervised and continuing with their current duties, unless there is cause for concern the school or college should not request a DBS check with barred list check because the volunteer should already have been checked.

80. For existing volunteers not in regulated activity there is no requirement to request an enhanced DBS check. However the school or college may choose to request one as they judge necessary but may not request a check of the barred list.

81. If a volunteer is not engaging in regulated activity, the school or college should undertake a risk assessment and use their professional judgement and experience when deciding whether to seek an enhanced DBS check. They should consider:

- the nature of the work with children;
- what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability; and
- whether the role is eligible for an enhanced DBS check.

82. The Protection of Freedoms Act 2012 amended the Safeguarding Vulnerable Groups Act 2006, removing supervised volunteers from regulated activity and applying a duty on the Secretary of State to issue guidance to assist regulated activity providers such as schools and colleges, to decide what level of supervision is required so that this exclusion would apply. If the volunteer is to be supervised while undertaking an activity which would be regulated activity if it was unsupervised, the statutory guidance must be followed. This is replicated at Annex D. The guidance issued following this change requires that:

- there must be supervision by a person who is in regulated activity;
- the supervision must be regular and day to day; and
- the supervision must be “reasonable in all the circumstances to ensure the protection of children”.

83. Employers are not legally allowed to request a barred list check on a volunteer who, because they are supervised, is not in regulated activity.

### **School and college governors**

84. School and college governors who are volunteers should be treated on the same basis as other volunteers, that is, an enhanced DBS check with barred list check should only be requested if the governor will be engaged in regulated activity. Governing bodies and proprietors can request an enhanced DBS check without a barred list check on an individual as part of the appointment process for governors.

### **Contractors**

85. Schools and colleges should have arrangements in place with contractors to make sure that the contractor, or any employee of the contractor, working at the school or college has been subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of children regularly). If the work is in a specified place such as a school, paid workers remain in regulated activity even if supervised.

86. Contractors and contractors’ employees for whom an appropriate DBS check has not been undertaken should be supervised if they will have contact with children.

87. If a contractor working at a school or college is self-employed, the school or college should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

88. Schools and colleges should always check the identity of contractors and their staff on arrival at the school or college.

### **Visitors**

89. Schools and colleges do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children’s relatives or other visitors attending a sports day). Headteachers and principals should use their professional judgment about the need to escort or supervise visitors.

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

90. Schools and colleges organising work experience placements should ensure that policies and procedures are in place to protect children from harm.

91. Barred list checks by the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. The school or college would have to consider the specific circumstances of the work experience, in

particular the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations would include whether the person providing the teaching/training/instruction/supervision to the child will be:

- unsupervised; and
- providing the teaching/training/instruction frequently (at least once a week or on more than three days in a 30 day period, or overnight)

92. If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. If so, the school or college could ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

93. Schools and colleges are not able to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience.

94. If the activity undertaken by the child on work experience takes place in a 'specified place', such as a school or college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity. In these cases and where the child is 16 years of age or over, the work experience provider should consider whether a DBS enhanced check should be requested for the child/young person in question. DBS checks cannot be requested for children/young people under the age of 16.

#### **Proprietors of independent schools including academies and free schools or alternative provision academies and free schools**

95. Before an individual becomes either the proprietor of an independent school or the chair of a body of people which is the proprietor of an independent school, the Secretary of State will:

- carry out an enhanced DBS check;
- confirm the individual's identity; and
- if the individual lives or has lived outside of the UK, making an enhanced check insufficient, such other checks as the Secretary of State considers appropriate.

96. The Secretary of State also undertakes these checks in respect of the chair of governing bodies of a non-maintained special school.

97. The requirement for an enhanced DBS check is disapplied for the chair of an academy trust if the academy is converting from a maintained school and the person has already been subject to a check carried out by the local authority.

98. Where the proprietor is a body of people, the chair must ensure that enhanced DBS certificates are obtained for the other members of the body and that identity checks are completed before, or as soon as practicable after, any individual takes up their position. Further checks as the chair considers appropriate should be undertaken where, by reason of the individual's living or having lived overseas, obtaining an enhanced DBS check is not sufficient to establish his or her suitability to work in a school.

99. In the case of an academy trust newly established to operate a free school, the DfE will ask the DBS to conduct checks on all members and directors of the new trust. Academy trusts, including those established to run a free school, have the

same responsibilities as all independent schools in relation to requesting enhanced DBS certificates for permanent and supply staff.

### **Children staying with host families**

100. Schools and colleges quite often make arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. This might happen, for example, but not only, as part of a foreign exchange visit or sports tour. Such arrangements could amount to “private fostering” under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both. See Annex C for further details.

### **Annex E: Disclosure and Barring Service checks**

These are the types of checks available to those working with children: <b>Type of check</b>	<b>What the check involves</b>	<b>Positions eligible for this level of check</b>
<b>Standard check</b>	Check of the Police National Computer records of convictions, cautions, reprimands and warnings.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.
<b>Enhanced check</b>	Check of the Police National Computer records <b>plus</b> other information held by police such as interviews and allegations. This information must be relevant to the sector and be approved by the police for inclusion on the certificate.	The position being applied for must be covered by an exempted question in both the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and in Part 5 of the Police Act 1997 (Criminal Records) Regulations.*
<b>Enhanced criminal record check with children’s and/or adult’s barred list information</b>	Check of the Police National Computer records <b>plus</b> other information held by police <b>plus</b> check of the DBS Children’s Barred List <b>plus</b> check of the DBS Adults’ Barred List.	The position must be eligible for an enhanced level criminal record check as above and be for a purpose listed in Regulation 5 of the Police Act 1997 (Criminal Records) Regulations <sup>54</sup> as able to check the barred list(s).