RECRUITMENT, SELECTION AND APPOINMENT POLICY

Scope

This policy applies to John Lyon School, which comprises the 'Senior School' and the 'Prep School.' All references to 'the School' refer to John Lyon School except where otherwise specified.

Introduction

The principal objective of this policy is to attract, recruit and retain staff of the highest calibre, who share a firm commitment to the School's purpose and values. The aims of this policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to deter, identify and reject prospective applicants who are unsuitable for work with children or young people;
- to ensure that all job applicants are considered and assessed equally and consistently;
- to ensure that no job applicant is unfairly considered on any grounds of Protected Characteristics in accordance with the Equality Act.
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), including Keeping Children Safe in Education (KCSIE), the Education (Independent School Standards) (England) Regulations 2014, the ISI inspection framework and handbook, and relevant guidance or codes of practice published by the Disclosure and Barring Service (DBS); and
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

RECRUITMENT AND SELECTION PROCEDURE

Advertising of Posts

The aim of advertising is to attract a wide range of high-quality candidates from diverse backgrounds. All advertisements for posts, must include a clear statement confirming that the School is committed to safeguarding and promoting the welfare of children, that all appointments are subject to safer recruitment checks, and that shortlisted candidates will be required to complete a self-declaration and will be subject to an online search.

Job Description and Person Specification

The qualifications, skills, experience, knowledge, aptitudes and abilities required for the post will be clearly identified in the job description and person specification. Requirements must be proportionate to the role and capable of objective justification. Each job description will state that the post-holder is responsible for safeguarding and promoting the welfare of children and young people with whom they come into contact, and will identify any management, teaching, regulated activity or other safeguarding responsibilities relevant to the post.

Application Form

The School will only accept applications from candidates applying for roles on a School employment contract with a fully completed School application form. CVs will not be accepted as a substitute for application forms, except in cases of temporary agency staff. Any gaps in employment history must be accounted for and will be explored (and noted) at interview.

The School's Safeguarding and Child Protection Policy is available upon request from the Head of HR and is also published in the School's Staff Handbook and School's website. The School's policy on the Recruitment of ex-Offenders can be found at Appendix A of this policy.

Online Search

As part of the shortlisting process, we will consider carrying out an online search on shortlisted candidates as part of our due diligence. This may include using the online platform provided by Safehire.ai to undertake Surface and Deep Web background checks on shortlisted candidates for purposes including but not limited to compliance with applicable laws and regulations (such as safeguarding obligations, including those referenced in the UK Department for Education's statutory guidance: "Keeping Children Safe in Education" as updated from time to time), risk management, due diligence, and internal policies. This may help to identify any incidents, issues or concerns that are publicly available online, which we may want to explore with an applicant at interview. This forms part of our wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children in a school environment.

Invitation to Interview

The School will shortlist applicants for interview based on selection criteria which assesses the candidate's qualifications, skills, experience, knowledge, aptitudes and abilities against the job description and person specification. This shortlisting procedure will include an online search. Recruiting Managers are responsible for ensuring that shortlisting decisions are fair, objective and non-discriminatory.

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. This information should only be requested from applicants who have been shortlisted. The information should not be requested in the application form to decide who should be shortlisted.

The School will not unfairly discriminate against any applicant on the basis of a conviction or other details revealed. Each case will be decided on its merits, in accordance with the objective assessment criteria set out in the School's policy on the recruitment of ex-offenders (at Appendix 1).

Shortlisted applicants will be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail. All formal interviews will have a panel of at least two people. In accordance with Safer Recruitment best practice, the School ensures that at least one person on the recruitment panel/s will have undertaken Safer Recruitment training. A written record of the interview will be kept and destroyed after six months for unsuccessful candidates. The interview notes for successful candidates will be kept on their employment files for the duration of their employment and thereafter kept in accordance with the School's Privacy Policy.

Recruiting managers should ensure that the assessment process is documented sufficiently to evidence the reasons for selection decisions. Where a candidate is appointed, any probationary or

initial review period must be actively managed, with objectives, safeguarding expectations and conduct standards made clear from the outset.

In addition to technical/competency-based questions, candidates will be asked questions relating to their attitude and motivation to want to work with children and young people or in an environment where they are present.

In order to expedite Safer Recruitment checks, all applicants invited to interview are requested to provide the following original documentation on their interview day:

- at least one form of photographic ID
- proof of address
- proof of the right to work in the UK
- any original documents confirming educational and professional qualifications that are relevant to the vacancy.

Conditional offer of appointment

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following basis:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment;
- verification of the applicant's identity (where that has not previously been verified);
- the receipt of at least two written references (one of which must normally be from the applicant's most recent employer), which the School considers to be satisfactory;
- for teaching positions, confirmation from the Teaching Regulation Agency (previously known as the National College for Teaching and Leadership (NCTL)) that the applicant is not subject to a prohibition order (including check of any overseas authority restrictions, if applicable);
- for leadership positions, confirmation that the applicant is not barred from taking part in the management of an Independent School;
- the receipt of an Enhanced Disclosure from the DBS which the School considers to be satisfactory, and that the enhanced DBS certificate is provided to the School before the first day of employment;
- where the position amounts to "regulated activity" (see section 5.3 below) confirmation that the applicant is not named on the Children's Barred List administered by the DBS:
- verification of the applicant's medical fitness for the role (see section 4 below); and
- verification of the applicant's right to work in the UK;
- any further checks, which are necessary as a result of the applicant having lived or worked outside of the UK; and
- verification of professional qualifications which the School deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).

- the satisfactory completion of all Safer Recruitment pre-employment checks, as outlined in this policy.

PRE-EMPLOYMENT CHECKS

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

Verification of identity and address

All applicants who are invited to interview will be required to provide original documentation as evidence of identity, right to work in the UK, original proof of address (no less than three months old in the case of bank/credit card/mortgage statements and no less than 12 months old in the case of utility bills) and, if relevant to the role, qualifications.

The School complies with the DBS identity checking guidelines. As part of the recruitment process, applicants will be advised of the original documents they are required to bring with them if invited for interview.

Where an applicant claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration), they will be required to provide documentary evidence of the change.

The School asks for the date of birth of all applicants (and proof of this) in accordance with ISI Guidance and KCSIE. Proof of date of birth is necessary so that the School may verify the identity of all applicants as well as check for any unexplained discrepancies in their employment and education history.

References

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the School. References should be received, scrutinised and concerns resolved satisfactorily, before the appointment is confirmed. A complete set of references will be taken up once an offer of employment is made, unless these have been received previously, noting that if obtained prior to interviews taking place, this can allow any concerns to be explored further at the interview.

One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does/did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children where this is possible.

Neither referee can be a relative or someone known to the applicant solely as a friend or colleague. References need to be from a senior person within the organisation and should be confirmed by the Head if the employee is/ was school based.

The School may, at its discretion, require further references, as appropriate, in order to satisfy itself that the preferred candidate is both suitable and appointable.

All referees will normally be sent a copy of the job description and person specification for the role for which the applicant has applied. Referees will be asked to complete a reference confirming the following:

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

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

The School will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed. The School will contact referees on receipt of references to verify that they have supplied the reference.

Medical Fitness

The School must verify the mental and physical fitness to carry out their work responsibilities in respect of anyone to be appointed to a post at the School, after an offer of employment has been made but before the appointment can be confirmed.

It is the School's practice that all applicants, to whom an offer of employment is made, must complete a Medical Declaration Form. The information contained in the questionnaire will then be held by the School in strictest confidence and processed in accordance with the School's Employee Privacy Notice and Data Protection Policy. The information will be reviewed against the Job Description and the Person Specification for the particular role. If the School has any doubts about an applicant's fitness, the School will consider reasonable adjustments in consultation with the applicant. The School may also seek a further medical opinion from a specialist and request that the applicant undertakes a medical assessment via the School's Occupational Health provider.

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

Prohibition Checks

Any offer of employment for a position involving teaching children will be subject to a Prohibition from Teaching check. Persons who are prohibited from teaching/and or management will not be

appointed to work at the School. Any offer of employment will not be confirmed until the School is satisfied that the individual is not prohibited from teaching.

Management positions at the School will also be subject to a s128 Prohibition from Management check. Candidates who are found to be prohibited from teaching/and or management will not be appointed to work at the School.

Prohibition from Teaching Orders (including overseas authority restrictions) prevent a person from carrying out teaching work in schools and other settings. A letter of professional standing from the professional regulating authority in the country/ countries in which the applicant has worked will be required where the applicant has taught abroad. The School will require extra references and an overseas criminal record check if a letter of professional standing cannot be obtained.

Prohibition from management directions (Section 128 directions) - The School is required to check for the existence of directions made by the Secretary of State under s.128 of the Education and Skills Act 2008 barring individuals from taking part in the management of an Independent School. The scope of the barring directions covers membership of proprietor bodies (including Governors), the Head, all staff on the senior leadership team (including non-teaching staff) and Teaching positions with departmental responsibility.

All members of staff employed by the School are regarded as being in 'regulated activity' for the purposes of this check.

Enhanced Disclosure and Barring Services (DBS) Check

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 amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced DBS Check is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List maintained by the DBS. As all staff in a school are considered to be in regulated activity, the School applies for an Enhanced disclosure from the DBS in respect of all prospective staff members, and unsupervised contractors and volunteers.

Posts at the School are exempt from the Rehabilitation of Offenders Act 1974. These are set out in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. This means that applicants applying for posts at the School must declare relevant criminal record information lawfully required for the role, including spent convictions and cautions that are not protected by the DBS filtering rules. Applicants who have been convicted of a criminal offence will be requested to give details, in confidence, in a separate, sealed envelope which will be opened by and discussed with the Head of HR, and a risk assessment will be placed on file.

The DBS filtering rules determine which cautions and convictions are disclosed on Standard and Enhanced DBS certificates. Certain old or minor offences may be filtered and will not appear on a DBS certificate. Filtering rules were first introduced on 29 May 2013, updated on 28 November 2020, and further updated for certificates issued on or after 28 October 2023.

All unspent conditional cautions and convictions are automatically disclosed. All convictions resulting in a custodial sentence, including a suspended custodial sentence, are always disclosed. Certain

serious offences, known as 'specified offences', are never filtered from Standard or Enhanced DBS certificates, unless they relate to a youth caution. These offences usually include serious violent, sexual or safeguarding-related offences.

Youth cautions, warnings and reprimands are not automatically disclosed on Standard or Enhanced DBS certificates. The previous rule requiring automatic disclosure of all convictions where an individual had more than one conviction has been removed; each conviction is now considered against the filtering rules individually. Applicants must not be asked to disclose filtered cautions or convictions, and the School will not take filtered information into account.

The list of "specified offences" which must always be disclosed contains a large number of offences, which includes certain sexual, violent and other offences that are considered so serious they will always be disclosed, regardless of when they took place or of the person's previous or subsequent criminal record. The list of "specified offences" can be found at:

https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from- a-criminal-record-check

The DBS now issues a DBS disclosure certificate to the subject of the check only, rather than to the School. Necessary arrangements must be in place to ensure the School has sight of the **original** disclosure certificate prior to commencement, and employment will remain conditional upon the original certificate being presented and it being considered satisfactory by the School.

If there is a delay in receiving a DBS disclosure and the position requires an urgent start, the recruiting manager, in consultation with HR, may allow an individual to begin work pending receipt of the disclosure only if:

- all other checks, including a clear Children's Barred List check, have been completed;
- the DBS application has been made in advance;
- appropriate supervision can be in place;
- a risk assessment is completed and reviewed until the DBS check is received.
- the person in question is informed what these safeguards are;
- a note is added to the Single Central Register and evidence kept of the measures put in place;
- The Designated Safeguarding Lead is provided with evidence of the above and authorises the commencement.

DISCLOSURE UPDATE SERVICE

The DBS Update Service allows individuals to register their details online with the DBS (as part of their enhanced disclosure application) and pay an annual fee to keep their DBS certificate details updated. This means that any future employers can quickly check the certificate online which will avoid many unnecessary repeat applications. Further information on the service is available from the HR Team or online at https://www.gov.uk/dbs-update-service. To use this service an employee must subscribe within 30 days of the certificate being issued.

The School will fund an enhanced DBS check once (on joining or if a certificate from within the last 3 years is not held) and will then reimburse the worker for the annual cost of signing up to the

Update Service (this has to be done by the individual and cannot be done centrally by the School). If a member of staff fails to keep their enrolment with the Update Service current, the School may require that member of staff to fund the cost of a further DBS check.

Any gaps in employment/engagement longer than three months will normally require a new enhanced disclosure check to be undertaken. The School has therefore made signing up to the update service a requirement for all casual workers who return to the School on a regular basis but may have 3+ months gaps before they return.

APPLICANTS JOINING WITH A LIVE DBS UPDATE SERVICE

In accordance with ISI guidance, if a potential employee has already got an Enhanced DBS Certificate and is on the Update Service then, subject to the following criteria, it may not be necessary to apply for a new DBS certificate prior to them commencing employment at the School:

- All other checks must be successfully conducted as normal
- The staff member must have a DBS certificate at the Enhanced Level and with the Barred List Check and have a live subscription to the DBS Update Service
- The staff member must be able to provide the original DBS certificate for the HR team to view
- The HR team must check the details on the original DBS certificate match the identity documents provided
- The HR team must run the online check of the DBS Update Service to check it matches the original DBS certificate (name, date of birth and certificate number)
- If the Update Service highlights any changes from the original certificate, a new DBS certificate will need to be sought in the normal manner

Overseas Criminal Records Check

If the School does not consider the DBS certificate alone as sufficient (because it would not cover offences committed abroad), the School will require whatever evidence of checking is available from the person's country of origin (or any other countries in which he or she has lived) before the appointment is confirmed.

The School requires that an overseas criminal records check is undertaken where the applicant has lived and/or worked abroad for three months or more in the past five years, in accordance with ISI requirements. This includes UK nationals returning after working in a foreign country. The Home Office has published guidance on what checks are available from different countries, and the process for requesting a check from the relevant country. The School will request extra references from countries that do not provide criminal record checks, or should the overseas criminal record check be delayed.

CONTRACTORS AND AGENCY STAFF

All external Contractors that work on School premises unsupervised, including those self-employed (e.g. Sports Coaches, Instructors, Builders, Visiting Music Teachers), are required to complete necessary checks similar to those employed directly by the School. In addition, the appointing HoD or Line Manager must ensure a Consultancy agreement or contract for services is in place with the

Human Resources Department. This not only ensures compliance with KSCIE and ISI regulations but also ensures the terms of the arrangement are clearly outlined and confirms that the individuals engaged are not employees of the School.

HoDs and Line Managers are required to notify Human Resources of any Contractors they wish to appoint through an External Contractor firm providing a minimum of four weeks' notice. The Head of HR will then arrange for the completion and verification of the necessary checks with the External Contractor firm and confirm when the Contractor may commence. The HoD or Line Manager must ensure they are entirely satisfied with suitability of any Contractor attending the School as, once appointed, they will be responsible for their actions and any work completed.

VOLUNTEERS

For volunteers or parents who only accompany staff and children on one-off outings or trips that do not involve overnight stays, please see the School Visitors' Policy.

In line with KCSIE 2026 and the statutory change to regulated activity, the School will assess volunteer roles by reference to the nature and frequency of the activity. Where a volunteer teaches, trains, instructs, cares for or supervises children in regulated activity, the School will obtain an Enhanced DBS check with children's barred list information, regardless of whether the volunteer is supervised.

Where a volunteer is not engaged in regulated activity but has the opportunity to come into contact with children on a regular basis, the School will consider whether an Enhanced DBS check without children's barred list information is appropriate, in accordance with statutory guidance and eligibility rules.

PREVENT DUTY

Under the Counter-Terrorism and Security Act 2015 the Prevent Duty requires specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. Under the Prevent Duty, all members of school staff, including recruiting managers, are required to use their professional judgment to identify any potential risks of radicalisation in respect of the children who are in the School's care and to act proportionately.

INDUCTION AND TRAINING

All staff including temporary staff and volunteers will be trained in child protection regularly, in line with advice from the LSCB this includes:

- the School's Safeguarding and Child Protection policy;
- the Staff Code of Conduct including the Whistleblowing Procedure;
- the identity of the Designated Safeguarding Lead
- a copy of Part One of KCSIE in full, which all staff must read; where KCSIE is updated, staff will be informed of the changes and required to confirm that they have read and understood the relevant updated guidance;
- Prevent awareness training.

The Head of HR is to establish and maintain a list of all staff to confirm that they have all received, read and understood the above policies and procedures.

Staff involved in recruitment, selection, onboarding or line management must receive appropriate briefing or training on safer recruitment, equality and non-discrimination, managing probation and early performance concerns, whistleblowing, family leave, sickness absence, harassment prevention and any statutory employment rights changes relevant to their role.

RETENTION OF RECORDS AND DATA PROTECTION

The School is legally required to undertake the checks outlined in this document. Therefore, if an applicant is successful in their application, the School will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. All information collected in relation to recruitment and selection will be held in accordance with the UK GDPR, the Data Protection Act 2018 and the School's data protection policies. We will observe strict confidentiality and only handle and store information in line with the School's Data Protection Policy and Privacy Notice.

Medical information may also be used to help the School to discharge its legal duty of care as an employer (e.g. so that the School may consider reasonable adjustments if an employee has a disability, or to assist with any other workplace issue).

Employees involved with shortlisting and appointments will have limited access to data provided, such as that on the School's application form. This information will not be disclosed to any other party outside the School.

This documentation (with the exception of DBS information) will be retained by the School for the duration of the successful applicant's employment. After employment ends it will be retained in accordance with the School's Data Retention Procedure.

If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.

DBS Information Retention

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, the School complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

The School is legally required to undertake the above pre-employment checks. Candidates will be required to provide certain information to enable the School to carry out the checks that are applicable to their role. The School will be required to provide certain information to third parties, such as the Disclosure and Barring Services and the Teaching Regulation Agency. Failure to provide requested information may result in the School not being able to meet its employment, safeguarding or legal obligations. The School intends to comply with its legal obligations under the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) and will process pre-employment information in accordance with its Job Applicant Privacy Notice.

If the applicant is successful, personal data gathered during the recruitment process (with the exception of DBS information) will be transferred to the new employee's personnel file and retained during their employment. DBS certificate information will not be kept any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints or be for the purpose of completing safeguarding audits.

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties; it is a criminal offence to pass this information to anyone who is not entitled to receive it. In addition, organisations that require retention of certificates in order to demonstrate 'Safer Recruitment' practice for the purpose of safeguarding audits may be legally entitled to retain the certificate.

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints or be for the purpose of completing safeguarding audits.

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). Details about how the School processes employee data and the periods for which data will be held is set out in the School's Employee Privacy Notice and Data Protection Policy

We have a duty to keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken to meet Safer Recruitment requirements.

The exception to this is where any criminal disclosures or police information appearing on the DBS certificate require risk-assessing in accordance with Safer Recruitment practices and IICSA guidance. In these circumstances, the DBS certificate, and any risk assessments conducted with the information contained therein, may be required to be retained on the employee's file indefinitely, where permissible or required by law.

Sensitive Information

Under the UK GDPR and Data Protection Act 2018, special category data includes information about race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data used for identification purposes, health, sex life and sexual orientation. Criminal convictions and offences data is separately protected and must be processed only where lawful conditions are met. The School may request some of the above information to comply with statutory safeguarding purposes, monitor its recruitment practices, and/or for diversity monitoring. Sensitive information used for statistical reporting purposes will be anonymised. After appointment, the information provided by successful applicants will be held securely in their personnel file.

REFERRALS TO EXTERNAL AGENCIES

This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks, the School also has a legal duty to make referrals to the DBS and/or TRA in circumstances where an individual:

- has applied for a position at the School despite being barred from working with children; or
- has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child (*Harm Test*).

POLICY DEVELOPMENT AND REVIEW

This procedure is designed to set good practice standards and to support compliance with statutory safeguarding, education and employment requirements. The School recognises that best practice and statutory obligations develop over time and will therefore review this policy at least annually, and sooner where required, to reflect changes in legislation, statutory guidance, regulatory expectations, employment rights or the School's internal organisation and policies.

Reviewed by: Head of HR
Implemented: September 2026
Next review: September 2027

APPENDIX 1 – POLICY ON RECRUITMENT OF EX-OFFENDERS

Background

The School will not unfairly discriminate against any applicant for employment on the basis of a conviction or other details revealed. The School complies with the Disclosure and Barring Service (DBS) Code of Practice and makes appointment decisions on the basis of skills, qualifications and experience. If an applicant has a criminal record, this will not automatically bar the candidate from employment within the School. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. Applicants must therefore declare criminal record information that is lawfully required for the role, including spent convictions and cautions that are not protected by the DBS filtering rules. Applicants are not required to disclose filtered cautions or convictions. A failure to disclose a previous conviction which should be declared may lead to an application being rejected or, if the failure to disclose is discovered after an offer of employment has been made, the job offer may be withdrawn. If it is discovered after employment has started, it 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 any person who is barred from working with children to attempt to apply for a position at the School. The School will make a report to the Police and /or the LADO, in the first instance, 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.

A subsequent referral to the DBS and/or the TRA may also become necessary.

Assessment criteria

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

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

Assessment procedure

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will carry out a risk assessment by reference to the criteria set out above. The risk assessment must be signed by the Head for Teaching appointments, and the COO for Support Staff appointments, before an appointment is confirmed. The Head and COO will normally consult prior to signing such a risk assessment.

If an applicant wishes to dispute any information contained in a disclosure, they can do so by contacting the DBS directly. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the School will, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information with the DBS.

Retention and security of disclosure information

The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

In particular, the School will:

- not retain disclosure information or any associated correspondence for longer than is necessary, normally for a maximum of six months.
- where disclosure information and other confidential documents issued by the DBS are stored (whether temporarily or for a longer period), this will be in locked, non-portable storage containers, access to which will be restricted to members of the HR department;
- The School will keep a record of the recruitment decision taken in relation to the conviction, and if the candidate is appointed, the risk assessment referred to above in relation to the convictions will be held on their employment file indefinitely;
- ensure that any disclosure information from the DBS is destroyed by suitably secure means such as shredding; and
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

APPENDIX 2 – SUMMARY OF CHECKS AND INFORMATION RECORDED ON THE SCR

- Name
- Position held
- Start date
- Date of Identity checks
- Date of Medical checks
- Date of Employment History checks
- Enhanced DBS certificate number, the date issued and sighted
- DBS Update service (where applicable)
- Children's Barred List check (where required separately)
- Professional qualifications (where applicable)
- Date of Reference checks
- Right to work in the UK checks
- Overseas criminal records check (where applicable)
- Childcare Disqualification checks (where applicable)
- Prohibition from teaching check (where applicable)
- Prohibition from management / Section 128 Check (where applicable)
- Online Checks

Reviewed by: *Head of HR*
Implemented: *September 2026*
Next review: *September 2027*