



CITY OF LONDON SCHOOL FOR GIRLS

RECRUITMENT POLICY

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1. Introduction

- 1.1 City of London School for Girls is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people.
- 1.2 The School is also committed to providing a supportive and flexible working environment for all of 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.
- 1.3 This policy should be read in conjunction with:
- The School's Safeguarding and Child Protection Policy
 - The City of London Corporation's Code of Conduct (and Code of Conduct for Teachers)
 - The City of London Corporation's Whistleblowing Procedure
- 1.4 This policy has been drawn up in line with Part 3 (Welfare, health and safety of pupils) and Part 4 (Suitability of staff, supply staff and proprietors) of the Independent Schools Standards Regulations and has been updated in accordance with Part 3 (Safer Recruitment) of the Department for Education (DfE)'s *Keeping Children Safe in Education: statutory guidance for schools and colleges* (September 2020).

2. The aims of this policy

- 2.1 *Keeping Children Safe in Education: statutory guidance for schools and colleges* (September 2020) states:

"Governing bodies and proprietors should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. The School or College should have written recruitment and selection policies and procedures in place".

- 2.2 Through the implementation of this policy, the School aims to ensure:
- that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position.
 - that all applicants are considered equitably and consistently.
 - that no applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.
 - that the School creates a culture of safe recruitment and, as part of that, adopts recruitment procedures that help deter, reject or identify people who might abuse children.

- that the School meets its commitments to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.
- compliance with all relevant recommendations and guidance including the recommendations of the DfE in *Safeguarding Children and Safer Recruitment in Education* and the code of practice published by the Disclosure and Barring Service (DBS).

3. Recruitment Process

3.1 The recruitment process is designed to ensure the suitability of persons appointed as members of staff at the School, such that:

- No such person is barred from regulated activity relating to children in accordance with section 3(2) of the 2006 Act where that person is or will be engaging in activity which is regulated activity within the meaning of Part 1 of Schedule 4 to that Act.
- No such person carries out work, or intends to carry out work, at the School in contravention of a prohibition order, or any direction made under section 128 of the 2008 Act or section 142 of the 2002 Act, or any disqualification, prohibition or restriction which takes effect as if contained in either such direction.
- The School carries out appropriate checks (which must be completed before a person's appointment) to confirm in respect of each such person the person's identity, medical fitness, right to work in the UK and, where appropriate, the person's qualifications.
- Where relevant, an enhanced criminal record check is made in respect of that person and an enhanced criminal record certificate is obtained before, or as soon as practicable after, that person's appointment.
- Further checks are made as the School considers appropriate in the case of any person for whom, by reason of that person living or having lived outside the UK, obtaining such a certificate is not sufficient to establish the person's suitability to work in a school.

3.1.1 Advertising

All posts are advertised clearly stating that they are exempt from the Rehabilitation of Offenders Act 1974, Exceptions Order 1975 (as amended in 2013) and that as part of the selection process the successful applicant will be required to obtain a Disclosure and Barring Service enhanced check. The School's safeguarding statement is also included in all job advertisements¹:

"City of London School for Girls is committed to safeguarding and promoting the welfare of children and applicants must be willing to undergo child protection screening appropriate to the post, including checks with past employers and the Disclosure and Barring Service."

3.1.2 Recruitment Personnel

¹ As displayed in recruitment information, including job adverts and application forms.

When a position becomes vacant the Deputy Head Academic, in the case of Teaching Staff, or the Bursar, in the case of Support Staff, will, in collaboration with the HR Department, undertake procedures to ensure a safe and successful appointment. A member of staff with appropriate Safer Recruitment training will be involved in the Selection Panel for **all** appointments².

Safer recruitment training has been undertaken by the HR Department, Deputy Heads, Headmistress, Bursar and others involved regularly in the recruitment of staff.

3.1.3 **For the recruitment of Teaching Staff**

The Head, assisted by SMT and the appropriate Head of Department, will lead on the recruitment process.

3.1.4 **For the recruitment of Support Staff**

The Bursar, assisted by the HR Department and, if required, members of the SMT and the relevant Head of Department, will lead on the recruitment process.

3.2 **Application Form**

The application form used by the School clearly states that posts are exempt from the Rehabilitation of Offenders Act. All applicants are required to complete the form as fully and effectively as possible to ensure that the Selection Panel receives consistent and equal information from all applicants.

The application form requires the applicant's full name and any previous name and date of birth. It also requires the applicant's full education, employment, volunteering and other history **with no gaps**. Reasons for leaving all previous posts are requested. All applicants must provide the names of two referees including the current or most recent employer. All applicants must disclose all convictions spent and unspent. **CVs are not accepted as an alternative to the application form.**

3.3 **Job Description, Person Specification and School / Department Information**

These contain the School's safeguarding statement and state clearly the need for an enhanced DBS check. The job description lists the main responsibilities and duties of the position which the successful applicant will undertake and makes reference to the responsibility for safeguarding and promoting the welfare of children. The person specification details the skills, experience and qualifications the School is looking for and includes specific reference to suitability to work with children. The person specification will be used to select the shortlisting criteria. The School / Department Information gives candidates up-to-date information about the School and the specific department.

3.4 **Selection of candidates and short-listing**

² The School Staffing (England) Regulations (2009) require governing bodies of maintained schools to ensure that at least one of the persons who conducts an interview has completed safer recruitment training; the School also operates in line with this requirement.

- 3.4.1 All application forms received will be read carefully and considered independently by the Selection Panel and a short-list drawn up.
- For main-scale Teaching Staff posts, the Head, Deputy Head Academic and relevant Head of Department liaise and select.
 - For Heads of Department posts, the Head liaises with the Deputy Head Academic and other members of the SMT as required.
 - For Senior Management posts, the Head liaises with the Senior Deputy Head and other members of the SMT as required.
- 3.4.2 For candidates not short-listed, the HR Department records for each candidate the reasons for not short-listing. These records are retained by the HR Department for 12 months.
- 3.4.3 Applications for internal posts (including positions of responsibility) are considered by the relevant members of the SMT.
- 3.4.4 For Support Staff posts, the HR Department short-lists with the Bursar or the relevant member of SMT or Head of Department.
- 3.4.5 For candidates not short-listed, the HR Department records for each candidate the reasons for not short-listing. These records are retained by the HR Department for 12 months.

3.5 Interview

3.5.1 Teaching staff

The HR Department will co-ordinate all teaching interviews and will liaise directly with SMT, Head of Department and applicants short-listed. The HR Department contacts candidates regarding the practical arrangements of the interview visit and where necessary Heads of Department contact candidates to further discuss the lesson(s) they will be required to teach.

3.5.2 Prior to or during the interview, candidates will be informed that:

- proof of ID, address and qualifications must be brought in on the interview day (to ensure right to work in the UK).
- references will be requested, including making contact with the current School at which the applicant is working or last worked, if he or she is not currently working in a school (in order to confirm employment details and reasons for leaving).
- all pre-employment checks must be completed before an appointment can be confirmed.
- the interview panel will ensure that any discrepancies and anomalies are scrutinised during the interview process, including accounting for any gaps in education and employment (see *Previous Employment History* section below).
- the interview panel will explore the candidates' suitability to work with children.

3.5.3 **Support staff**

The HR Department will co-ordinate all support staff interviews with the Bursar (and relevant members of the SMT or Head of Department as required). The interview procedure (as above) will be followed, in line with the City of London Corporation Human Resources Policy.

3.5.4 **Following the interview, for all Staff**

Notes taken at interview and in the 'Decision Meeting' will be dated and retained on file by the HR Department. Notes taken with regard to unsuccessful candidates are retained for 12 months. Feedback is provided to candidates where requested. Feedback requests are directed to the HR Department.

3.6 **Recruitment Checks**

3.6.1 **Barred List and Prohibition from Teaching checks**

A Barred List check is required for all new appointments to the School. This is normally conducted as part of a DBS check (see below), but a separate barred list check must be undertaken in the event that:

- a new enhanced disclosure with barring information is required but is not received in advance of a member of staff starting work in regulated activity.
- a pre-existing enhanced DBS check is accepted under the 'three-month rule' for a member of staff starting work in regulated activity.
- a pre-existing enhanced DBS check without barring information is accepted from a candidate who has subscribed to the DBS update service.

Teaching Staff appointments will be subject to checks by the HR Department to determine that they are not subject to a prohibition order issued by the Secretary of State, or other similar sanction or restriction imposed as a teacher.

3.6.2 **DBS Disclosure³**

An enhanced criminal records check ('DBS check') is required for all new appointments to the school. This includes volunteers and School Governors (see below). DBS checks are carried out by HR staff at the School and / or, for Support Staff and Governors, by HR staff at the City of London Corporation. During employment with the School, all staff are required to declare any convictions, cautions or reprimands, warnings or bind-overs.

Where a member of staff moves from a non-teaching to a teaching role, additional checks may be required.

If the disclosure is delayed (such that the DBS certificate has been applied for but is not available before a person starts work in regulated activity), the Headmistress may allow the member of staff to commence work subject to the following pre-conditions:

- a satisfactory check of the Barred List has been completed
- all other relevant checks have been completed satisfactorily

³ Reference is made to the 'Flowchart of Disclosure and Barring Services Criminal record checks and barred list checks' in the DfE's *Keeping Children Safe in Education*.

- it is done without the School confirming the appointment
- appropriate safeguards have been put in place, as determined by a risk assessment, which have been clearly communicated to the member of staff, and which will be regularly reviewed (until such time as the DBS certificate is available; see below). Risk assessments must be signed by the member of staff, the line manager responsible for the supervision and by the Head (or her delegate from the SMT). A copy of any such risk assessment will be sent to HR to file on the personal file.

Note: Guidance on risk assessment criteria, together with the Risk Assessment pro-forma which must be completed and signed off by the relevant authority before a person starts work, is provided at Appendix 2. If the risk is assessed at 'Medium' or 'High', the person should not start work until all proper checks have been completed. The risk assessment must be reviewed every two weeks and re-signed (where required) until all other checks are satisfactorily completed. If, at any stage, the new member of staff's behaviour is of concern, or the protection measures are not able to be implemented or sustained, then the permission to work must be withdrawn until such time as all other checks are satisfactorily completed. HR must be informed if there are any concerns

3.6.3 **Identity Checks**

All candidates must provide evidence of their identity and prove their right to work in the UK. They must bring to their interview (or, when requested, immediately thereafter) proof of identity and National Insurance number (if available). Acceptable proofs of identity include a British passport or current driving licence, passport / identity card issued by an EEA country or a passport from another country that contains a valid Visa / Permit, and acceptable proofs of NI number include a NI card or recent P60/P45.

Applicants are also required to provide proof of address (such as a utility bill, bank statement or similar) on the interview day (or, where agreed, immediately thereafter).

Applicants who are unable to bring these proofs of identity and address to interview must do so before taking up appointment and before the appointment is confirmed.

3.6.4 **Medical Fitness**

All successful applicants are required to complete a medical questionnaire to ensure the appropriate level of physical and mental fitness before any offer of appointment is confirmed.

3.6.5 **Previous Employment History**

Complete information about previous education and employment must be provided along with satisfactory explanations for any gaps in employment. The School will require applicants to explain at interview any employment gaps apparent from their application form.

3.6.6 References

Two professional references must be provided, one of which will be from the candidate's current (or most recent) employer. **Where a candidate has previously worked in a school but this was not the most recent employer a reference should also be sought from the school concerned.** These should always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support the appointment decision. Any discrepancies or anomalies must be followed up. Direct contact by telephone is required with each referee to verify the reference. Referees are required to answer specific questions about the candidate's suitability to work with children. If a verbal reference is taken then notes are taken, dated and signed and filed.

Any information provided through references concerning past disciplinary action or allegations that are disclosed should be considered carefully when assessing the applicant's suitability for the post.

3.6.6 References for internal positions

Two references should also be obtained for recruitment for internal positions (where an existing member of staff applies for a role or position within the School) including for:

- internal promotions
- position moves
- new, but not renewed, responsibility allowances

Typically, one reference will be sought from the member of staff's line manager and a second one from a senior member of the teaching staff. These references are supplied on a standard form available from the HR Department.

3.6.7 Qualification Requirements

Applicants must be able to demonstrate they have obtained any academic or vocational qualifications relevant to the post and claimed by them in their application form and which were taken into account when making the appointment. Applicants will be asked to provide original copies of these when attending interview. Applicants who are unable to bring these to interview must do so before taking up appointment and before the appointment is confirmed.

3.6.8 Suitability checks for applicants who have lived or worked outside the UK

If, because of a person living or having lived outside of the UK, a DBS check is not considered sufficient to establish suitability to work in a school, the School will carry out such further checks as deemed necessary, in line with relevant DfE and Home Office guidance. The checks usually involve a police check from the overseas country or country but where this is not possible additional references from the country concerned may be sought. All new appointments where persons are living or have lived outside the UK for more than three months once over the age of 18 will be subject to such additional checks. Where the additional checks have not been received before the person is due to start work they may be permitted to commence

employment with a risk assessment in line with those for members of staff commencing work before their DBS certificate has been received. The HR Department will be responsible for co-ordinating these checks and for coordinating the checking for evidence of permission to work.

Where a person is an overseas-qualified teacher, the School will follow the Teaching Regulation Authority (TRA) guidance on requirements for overseas-qualified teachers and will ensure staff have the relevant qualifications. All applicants (for any role) who have lived and worked in any country overseas (since the age of 16) **must** undergo:

- all the checks as for other staff (including an enhanced DBS check, even if the applicant has never been to the UK), plus
- any additional checks the School considers appropriate: these additional checks could include, where available, a criminal records check for overseas applicants, in line with relevant DfE and Home Office guidance.
- for applicants for teaching roles, these additional checks could also include a letter of professional standing, where available.

Where this information is not available, the Schools will seek alternative methods of checking suitability and / or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

HR will be responsible for coordinating these suitability checks, and for coordinating the checking for evidence of permission to work. Where a person is an overseas-qualified teacher, the School will follow the TRA guidance on requirements for overseas-qualified teachers and will ensure staff have the relevant qualifications.

3.6.9 Prohibition from management of independent schools check

For new appointments to management positions, checks must be made to ensure that a section 128 direction have not been made by the Secretary of State, precluding that person from a management role.

Such management positions include:

- The Head
- All staff on the Senior Management Team
- Teaching positions with Head of Department responsibility
- Proprietors (see below)

3.7 Conditional Offer of Appointment

An offer of appointment will be made only after the satisfactory references have been received (written and / or verbal) and after approval by the Head (for Teaching Staff) or the Bursar (for Support Staff).

The letter of appointment will make it clear that the offer is subject to satisfactory completion of the required safeguarding checks and right to work in the UK as outlined above.

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4. Supply Staff and Trainee / Student teachers

- 4.1 When a Supply Agency is used to provide temporary Teaching Staff to the School, the Senior Deputy Head and HR Department will ensure that the agency supplies appropriate documentation giving details of all the checks that the agency has carried out on that person to ensure that they are suitable to work in the School. That documentation will be retained by HR staff.
- 4.2 Temporary Teaching Staff from a Supply Agency are required to show current photo ID and their DBS certificate when they arrive at the School. This documentation will be retained by HR staff.
- 4.3 When a Supply Agency is used to provide temporary Support Staff to the School, the HR Department will ensure that the agency supplies appropriate documentation giving details of all the checks that the agency has carried out on that person to ensure that they are suitable to work in the School. That documentation will be retained by HR staff.
- 4.4 With trainee or student teachers who are on temporary positions in the School, the member of the SMT with oversight of such persons (usually the Assistant Head Teaching and Learning) and the HR Department will ensure that the all necessary checks are completed (Appendix 1).

5. Governors (The Proprietor)

- 5.1 **DBS, Barred List and Prohibition checks for Governors**
The DBS maintains 'barred lists' of individuals who are unsuitable to work with children. Where barred list information is requested, and 'children's workforce independent schools' is specified in the parameters for that check, the certificate will also detail whether the applicant is subject to a direction made under section 128 of the Education and Skills Act (2008). Such a direction prohibits an individual from taking part in the management (including being a governor) of independent schools in England.
- 5.2 The School, in conjunction with City of London Corporation HR staff, undertakes to perform all such checks as are required to confirm the suitability of governors ('the Proprietor', as described in Part 4, Paragraph 20 of the Independent Schools Standards Regulations).

6. Staff Induction and Training

- 6.1 **Safeguarding and Child Protection**
All appointed staff are provided with the following documents, and they are required to sign a register to confirm they have been read and understood them:
- The Safeguarding and Child Protection Policy (including the Staff Safeguarding Code of Conduct) and the identity and role of the Designated Safeguarding Lead (DSL) and Deputy DSLs

- Part 1 of the DfE's *Keeping Children Safe in Education* (including Annex A for those who work directly with children)
- The Staff Code of Conduct, including the Whistleblowing Procedure
- Pupil Behaviour Policy
- Data Protection Policy (Employees)
- Mental Health and Wellbeing Policy
- Health and Safety Policies

Safeguarding and Child Protection is also covered in the induction training for all staff (including, where appropriate, an online child protection course), which includes the arrangements for Children Missing in Education.

- 6.2 Further guidance can be found in the New Staff Induction Handbook, available in the Staff Handbook or from the Senior Deputy Head or HR Department.

7. Equal Opportunities

- 7.1 The School promotes employment practices designed to eliminate discrimination. All applicants are provided with an equal opportunities monitoring form to complete.

- 7.2 The School aims to ensure that:

- no applicant for a job receives less favourable treatment on the grounds of:
 - sex
 - age
 - disability
 - sexual orientation
 - gender reassignment
 - religion or belief
 - race (including colour, ethnic or national origins)
 - pregnancy and maternity
 - marriage and civil partnership
- all applicants will be treated equally and fairly in the recruitment process outlined in this policy
- the successful applicant will be recruited (and subsequently trained) on the basis of ability, experience and skill(s) to undertake the job successfully, as defined within the job description and person specification.

- 7.3 Further information and guidance is given in the City of London Corporation Equal Opportunities in Employment Policy, which is available from the HR Department.

Appendix 1: Safer Recruitment Checklist

Item	Description	Checked by	Date
1	Application Form (signed/typed name, declaration on criminal record and suitability to work with children)		
2	Equal Opportunities Monitoring Form.		
3	Full employment history (gaps to be scrutinised by interview panel prior to any appointment)		
4	Check of identity/address/National Insurance number and right to work and live in the UK.		
5	Disclosure and Barring Services Check ('Enhanced DBS')		
6	Written references x 2 (to include last employer)		
7	Verbal verification of references x 2 (for the successful applicant) – notes taken and filed		
8	Overseas check for work or residence overseas/3 rd reference		
9	Prohibition from teaching check		
10	Prohibition from Management check (for Senior Management)		
12	Disqualification from childcare (for select Senior posts)		
13	Proof of relevant qualifications		
14	Satisfactory Medical Clearance		
15	Interview notes – kept for required period		
16	Approval for hire from Headmistress (for academic staff) or Bursar (for support staff)		
17	Offer letter (subject to all these and the Enhanced DBS check being fulfilled and acceptable)		
18	Contract signed and sent		

Appendix 2: Risk Assessments

- 1.1 There would need to be exceptional and justifiable circumstances for employment to commence prior to DBS clearance. Such a decision can only be taken by the Headmistress or her delegate from the Senior Management Team, following a risk assessment. In any circumstances, potential employees cannot commence work prior to the Barred List check being completed. Nor may they commence work prior to the submission of their completed disclosure application to the DBS.
- 1.2 There must be a record of the Risk Assessment and decision, including “sign off” by the Headmistress, to ensure the auditability and accountability of the judgement. The judgement is an assessment of the risk versus the consequences of the decision. The Risk Assessment pro-forma (see below) is to be used to act as an auditable record of the decision made following risk assessment and must contain the signature of one of the accountable persons. This responsibility cannot be delegated.
- 1.3 If a decision is taken to allow an employee to commence work prior to receiving the DBS certificate, the employee must have completed and submitted their completed disclosure application to the DBS, and their contract of employment should remain subject to this condition being met. The application’s progress within the DBS system should be checked and monitored on a regular basis.
- 1.4 Robust and reliable supervision arrangements must be put into place during the “waiting period”. The employee must be clearly notified of the supervision arrangements that are in place. The situation must be checked and monitored at least every two weeks. The Headmistress, Senior Deputy Head or Bursar remains accountable during this time, until the clearance is received, checked and suitability confirmed.
- 1.5 If at any stage, the new member of staff’s behaviour is of concern, or the protection measures are not able to be implemented or sustained, then the permission to work must be withdrawn until such time as all checks have been satisfactorily completed.
- 1.6 **Risk Assessment - Key Questions for Consideration**
 - 1 **What are the exceptional reasons for considering commencement of employment prior to receiving clearance?**

This should not be a natural default position, and should be exceptional and clearly linked to the circumstances identified in response to Question 2 below.
 - 2 **What would be the consequences to the School’s operations of waiting until clearance is received?**

These should be exceptional and have a demonstrable substantial impact. The School should be able to demonstrate how it has used effective planning to avoid / minimise this disruption, and clearly show where this has been unavoidable.

3 Is the employee known to the school?

A former employee, who would have had a DBS check when working in the School, and of whom a great deal is known, will present a much lesser risk than a new employee, who is not known to at all. The more recent the departure the lower the risk.

4 If the employee commenced work, what would be their normal level of access to children?

- i. Unsupervised access one-to-one*
- ii. Unsupervised access to a group*

Neither of these would be acceptable arrangements in any circumstances during this "waiting period".

- iii. Supervised access one-to-one*
- iv. Supervised access to a group*
- v. No direct access, but based within premises*

In these circumstances, if an employee does commence employment prior to clearance being received, their access must be supervised at all times. The level of risk declines the lower down the list above, but there continues to be a risk with each of these scenarios.

RISK ASSESSMENT: CONSIDERATION OF COMMENCEMENT OF EMPLOYMENT PRIOR TO DBS CLEARANCE

Name of prospective employee:		Name of Assessor (Headmistress / Bursar / Senior Deputy Head)	
Role:		Date of Risk Assessment:	

RECORD OF FINDINGS

Reasons for considering commencement of employment prior to receiving clearance:		Supervision arrangements during “waiting period” and any other control measures:	Pre-employment checklist:
			Has the employee left employment? Y / N Medical clearance received? Y / N / NA Right to work in UK check completed? Y / N Qualifications verified? Y / N ICBL check completed (if applicable)? Y / N References (x2) verified? Y / N Satisfied with general background & Employment history checks? Y / N
Consequences of waiting for clearance (i.e. not allowing the prospective employee to start prior to receiving a satisfactory disclosure):			Previous DBS clearance:
			Is a previous disclosure available? Y / N Has it been seen by you? Y / N What is its date? _____

<p>Assessment of Risk following control measures (circle one): HIGH MEDIUM LOW</p> <p>Options:</p> <p>1) If assessed as HIGH or MEDIUM Risk this prospective employee may not commence work prior to satisfactory clearances.</p> <p>2) Following an assessment of the risks, if assessed as LOW risk, I have determined that the above named person may commence employment with the identified control measures. I undertake to personally review this situation at intervals of no less than every two weeks.</p>

Member of Staff Date

Supervising Manager Date

Having reviewed the risk assessment I confirm that the member of staff may commence work prior to the school viewing the DBS certificate.

Head Date

To be reviewed on

Member of Staff Date

Supervising Manager Date

Head Date

To be reviewed on