



KEW COLLEGE PREP

Recruitment and Selection Policy including Safer Recruitment

This policy applies to the whole school including the EYFS

This policy applies to all school employees and adults working with children, including volunteers. This policy is published on the Kew College Prep website and is also available from the School Office upon request.

This policy is written with due regard to the following:

Disqualification under the Childcare Act 2006

The Equality Act (2010)

Independent Schools Standards Regulations (ISSRs)

ISI Handbook for the Inspection of Schools – Commentary on the Regulatory Requirements (Sept 2023)

Keeping Children Safe in Education (KCSIE 2024)

Working Together to Safeguard Children (Sept 2018)

See also the School's policies as follows:

Safeguarding and Child Protection Policy, Internet and Online-safety Policy, Staff Induction Procedure, Staff Guide to School Procedures, Management of Contractors Policy and Whistleblowing Policy and Procedures.

Definitions or abbreviations used in this policy

CV: Curriculum Vitae

DBS: Disclosure and Barring Service checks

DfE: Department for Education

DSL: Designated Safeguarding Lead – person responsible for safeguarding in school

EYFS: Early Years Foundation Stage

ISI: Independent Schools Inspectorate

SCR: Single Central Register of Appointments

The School: Kew College Prep

TUPE: Transfer of Undertakings (Protection of Employment) Regulations

At Kew College Prep

DSL: Sarah Jones

Deputy DSL and Head: Jane Bond

Deputy DSL Early Years: Selbi Fryer

1. INTRODUCTION

Kew College Prep is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. The School pays due regard to Safeguarding and Safer Recruitment and provides all staff with safeguarding training in line with government guidelines. As part of our culture of safe recruitment, the School adopts

recruitment procedures that help deter, reject or identify people who pose a risk of harm to children.

The School's intention is to attract, select and retain employees who will successfully and positively contribute to the Kew College Prep community. A motivated and committed workforce with appropriate knowledge, skills, experience and ability to do the job is critical to the School's performance and fundamental to the delivery of a high quality service.

2. PURPOSE OF THIS POLICY

To ensure that the recruitment of both permanent and temporary staff (including volunteers) is conducted in a safe, fair, effective, cost efficient and transparent manner, with all the necessary professional and safeguarding checks being carried out and found to be satisfactory before an appointment is confirmed.

To achieve this, those responsible for each stage of the recruitment process will, at all times, be expected to demonstrate a professional approach by dealing honestly, efficiently and fairly with all internal and external applicants.

3. RESPONSIBILITY

The ultimate responsibility for recruitment and selection lies with School Governors. School Governors appoint the Head and the Bursar and have delegated the responsibility to the Head for appointing all other staff.

4. AIMS AND OBJECTIVES

- To ensure the safeguarding and welfare of children and young people
- To ensure a consistent and equitable approach to the appointment of all school staff
- To ensure all relevant legislation is adhered to
- To ensure the most cost effective use is made of resources in the recruitment and selection process

5. PRINCIPLES

The following principles are encompassed in this policy:

- Safer Recruitment guidance will be followed at all stages of the recruitment and selection process
- All applicants will receive fair treatment in line with current legislation
- A Job Description and Person Specification will be used. The Person Specification will specify the required knowledge, skills and experience needed for the job
- Selection processes will include application form, shortlisting, interview, relevant skill tests where appropriate, satisfactory completion of all mandatory pre-recruitment checks. Appointments are subject to the receipt of two satisfactory references
- Suitability references will be sought for internal candidates. Internal references may be permissible when appropriate
- The candidate's suitability to work with children will be explored at interview

- The Equality Act (2010) makes it a requirement to make reasonable adjustments to the recruitment process if an applicant makes the employer aware that they have a disability. This applies to the entire recruitment process, from advertisement to appointment
- All job applicants will be considered solely on their ability to do the job

6. SAFER RECRUITMENT – RECRUITMENT AND SELECTION TRAINING

It is a requirement of the School that at least one member of the shortlisting and interview panel has successfully completed Safer Recruitment Training prior to the start of the recruitment process.

7. PRE-RECRUITMENT PROCESS

The objective of the recruitment process is to attract, select and retain staff who will contribute positively to the school community and pupil experience and development. The recruitment experience should be positive and welcoming, with this in mind those responsible for recruiting will:

- Give successful applicants a clear understanding of the post and what is expected of them
- Seek to leave a positive image with unsuccessful applicants

7.1. Job Description and Person Specification

A Job Description and Person Specification is required for all posts. The Person Specification sets out a profile of the necessary requirements for the post together with other desirable criteria and the assessment method. It will also set out the individual's responsibility for promoting and safeguarding the welfare of the children.

7.2. Advertisement

All adverts will have a statement of the School's commitment to safeguarding and promoting the welfare of children, and the need for the successful applicant to be DBS checked at enhanced level. Short advertisements will not include the full statement but will refer applicants to the School's website where the full statement will be included on the Jobs page.

7.3. Information for Applicants

This includes a copy of:

- The application form and notes for applicants which includes relevant information about the School and the recruitment process
- The Job Description and Person Specification
- A statement confirming the School's commitment to safeguarding
- It will also inform that the School will carry out all relevant recruitment checks

7.4. Application Form

A standard application form will be used to obtain a common set of core data from all applicants including full employment and education history and a Rehabilitation of Offender's Act Declaration Form.

8. INTERVIEWS

The interview will assess the merits of each candidate against the job requirements, and explore their suitability to work with children and young people. The selection process for people who will work with children will always include a face-to-face interview.

Invitation to interview

The invitation to interview gives details about the arrangements for interviews, including time and place, directions to the venue and name of the interviewer(s).

It will also ask candidates to advise of any adjustments that may be necessary as part of the selection process.

The invitation will also detail any tasks the candidate is required to carry out for example:

- For teaching staff this will always include teaching an observed lesson
- For teaching assistants and admin staff this will be a suitable task
- For middle and senior managers, tasks will be appropriate to the position, such as preparing and delivering a presentation and undertaking intray-exercises

Interview Panel

The candidate will be interviewed by a minimum of two interviewers, one of whom will have the necessary authority to make decisions about appointments. At least one member of the panel will have completed Safer Recruitment Training. Before the interviews, the interviewers will meet to decide on the interview content, questions and methods of assessment and the minimum required standard for the role. Interviewers will ensure that there is no conflict of interest and that equal opportunities principles are adhered to.

Interview notes will be kept on all candidates and lesson observation notes on teaching applicants. For unsuccessful candidates, these will be kept for a minimum of three months and no more than twelve months after the decision has been made. For successful candidates the interview notes are added to the individual's HR file and retained for 6 months.

Scope of the Interview

In addition to assessing and evaluating the applicant's suitability for the post, the interview panel will also explore:

- The candidate's attitude toward children
- Their ability to support the School's agenda for safeguarding and promoting the welfare of children
- Gaps in the candidate's employment history
- Concerns or discrepancies arising from the information provided by the candidate and/or a referee

Unless references are obtained before the interview, the candidate will also be asked at interview if there is anything they wish to declare/discuss in light of the questions that have been (or will be) put to their referees.

9. PRE APPOINTMENT CHECKS

Current ISI Guidelines are used to determine whether the successful applicant will be engaged in *regulated activity* or not, and therefore which checks are appropriate.

The School adheres to the regulations and Keeping Children Safe In Education, which provide details of the checks which are required for each new member of staff.

The following are categorised as ‘staff’: teachers, peripatetic teachers and coaches, part-time staff, students, administrative staff, caretakers and other ancillary staff, staff appointed from overseas, pupils paid to work at the School (for example as after-school carers).

The DfE permits schools to exercise professional discretion as to when self-employed people should be treated as ‘staff’ or as ‘contractors’. As a rule of thumb, if the person is in regulated activity in the school they are treated as ‘staff’. For a contractor where this is not clear a risk based decision will be made and recorded. *For further information on ‘contractors’ see section 17 below.*

(i) Barred List

All candidates who are to be engaged in regulated activity **must** have a satisfactory Children’s Barred List check **before** they can begin regulated activity. Barring information is obtained as part of an enhanced criminal record check via the DBS.

(ii) Enhanced DBS

A DBS certificate is a document containing details of a person’s criminal record, including convictions, cautions, reprimands and warnings held on the Police National Computer. An enhanced disclosure may also contain details of information held on local police records which the police consider to be relevant to the workforce in which the person is applying for work.

The School carries out Enhanced DBS checks and must always have seen and evidenced the original enhanced disclosure certificate, which will have been supplied to the applicant (see DBS certificates not available). The School does not retain copies of DBS certificates for longer than 6 months.

When a DBS check is required, the School may apply once a conditional offer of employment has been made..

(iii) Identity checks for DBS

Photographic identity checks are made against an official document such as a passport or driving licence. Evidence of address is also required (for example, a utility bill, bank statement or similar). Original documents must be seen and verified.

(iv) Medical fitness

The School’s Medical fitness form allows the School to satisfy itself of the medical fitness of staff to carry out the duties of the post applied for, and includes both physical and mental health.

The School is committed to make practicable reasonable adjustments for staff as required.

(v) Previous employment history/CV/References

At least two written references will always be sought directly from the referees who should ideally be a senior person with appropriate authority (in a position to be aware of issues), not usually just a colleague. One reference should be from the candidate's current employer and, if applicable, the last educational establishment for whom they worked. The second reference may be a character reference where a second employment reference is not forthcoming or applicable. Where there is no current employer, verification of the most recent period of employment and reasons for leaving should be obtained. Such references will be supplemented by one or more others to address the suitability question (ie: whether they are aware of any reason or have any concern that the applicant may be not suitable to work with children).

References are sought on all successful candidates prior to taking up position. The references include a request for any reason why the applicant should not be employed for work with children and are checked on receipt to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate, for example if the answers are vague or if insufficient information is provided. Written references will also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate and should be resolved satisfactorily before the appointment is confirmed.

Checks of previous employment history should ascertain satisfactory reasons for any gaps in employment. The information provided by the candidate is checked against references subsequently received, and any discrepancies taken up with the candidate. Application Forms are also scrutinised for any time when the candidate has lived or worked overseas. If this is the case the procedures in (vii) will apply.

References should be addressed to the School. Open references, for example in the form of 'to whom it may concern' testimonials, are not acceptable nor will the School only rely on information provided by the candidate as part of the application process without verifying that the information is correct.

References not received in good time before appointment are chased and alternative referees approached if needed. For minimum compliance purposes, written references should be received before the person starts work. Should this not be practicable, for example, for an appointment made at short notice, the Head may give permission for a reference to be taken over the telephone by a suitably senior member of staff. If a reference is taken over the telephone, for evidential purposes detailed notes must be taken, dated and signed, and make clear who was spoken to. Confirmation must be given and recorded that there is no reason why the candidate should not work with children. Unless there is good reason not to, a written and signed reference from the referee should still be sought.

The School verifies that electronic references originate from a legitimate source.

Extra references are requested for applicants from countries which do not provide criminal record checks.

(vi) Qualifications, where appropriate

Where an appointment is dependent on an applicant's qualifications, such qualifications will be checked and verified in advance of appointment.

(vii) Overseas checks, where appropriate

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 considered appropriate, having regard to any guidance issued by the [DfE]'. Such checks must be completed before the person starts work. This applies where relevant both to foreign nationals and UK nationals returning from overseas.

The School will check those who have lived or worked overseas for 3 months or more (whether continuously or in total) in the last 5 years where reasonably possible.

In the absence of a response from official sources overseas before the person starts work, the School will seek alternative "further checks" before the person starts work, eg. additional references .

(viii) Right to work in the UK

All candidates have their right to work in the UK checked before they take up appointment. Should the applicant be on a visa, the details and length of the visa will be checked.

(ix) Prohibition from teaching orders

The School will always check Qualified Teacher Status or equivalent for teaching positions. The School policy is to check that anyone employed to carry out teaching work is not subject to a Prohibition Order issued by the Secretary of State.

Teaching Assistants may also need Prohibition Checks as it is likely that there will be occasions when they cover for a colleague and are unsupervised. The School will therefore decide on a case by case basis, in the light of their own practice relating to Teaching Assistants, whether these assistants require Prohibition Checks. Similar reasoning would also apply to those employed as sports coaches and similar posts.

(x) Prohibition from Management of independent schools directions (also known as "section 128 directions")

Staff appointed, both internally and externally, to management positions are checked against s.128 direction. The following staff are considered to be in management positions for the purpose of this check:

- Heads
- All staff on the Senior Leadership Team (including non-teaching staff)
- Teaching positions with departmental leadership positions
- Governors

(xi) Disqualification under the Childcare Act 2006

This Act relates to staff working in the Early Years (EYFS) and those involved in childcare for children under the age of eight in before and after-school settings. At Kew College Prep, all staff could potentially work with EYFS children.

We ask for declarations from any member of staff who we believe could potentially be asked to work with children in EYFS and any clubs providers who will be operating clubs for children under the age of 8 to self-declare that they are not “disqualified” from childcare. The declaration will be held with the safeguarding training records where consent to retain the declaration is obtained.

(xii) Transfer of employees under TUPE

If there is continuous employment under TUPE arrangements (e.g. through a change of cleaning company), there is a requirement for information to be passed on to the new owner. If the details are fully in order, the School as the new employer enters them on the SCR, including the number and the date of the DBS checks, and adds a note to the register that the details have been accepted under the TUPE arrangements. There must have been less than a three month break in employment. However, if the information is incomplete, it is necessary to undertake a new DBS check and to include all the other necessary checks.

(xiii) Online searches

The school carries out online searches on all appointed candidates prior to their commencement date as detailed in Appendix 1.

10. DBS CERTIFICATE NOT AVAILABLE BEFORE THE EMPLOYEE COMMENCES WORK

If the DBS certificate is not yet available before the person starts in regulated activity, the Head has the discretion to allow a member of staff to commence work if:

- The Barred List check has been undertaken and is satisfactory
- All other relevant checks have been completed satisfactorily
- The DBS application has been made in advance
- Appropriate safeguards, which are determined through risk assessment, are taken (eg loose supervision) and the matter will be reviewed every two weeks

11. RECORDING OF CHECKS

Progress of the pre-appointment checks for each appointment is tracked.

All required checks will be:

- documented
- recorded on the Single Central Register of Appointments (other than (xi) and (xii)), and
- followed up where they are unsatisfactory or there are discrepancies in the information provided

Checks (iv) – (viii) and check (xii) will be retained on the individual HR file and check (xi) will be retained with the safeguarding training records.

NB: The police and/or the Independent Safeguarding Authority will be notified in circumstances where:

- the DBS disclosure shows they have been disqualified from working with children by a court or

- an applicant has provided materially false information in, or in support of, their application, or
- there are serious concerns about an applicant's suitability to work with children

12. HANDLING AND SAFEKEEPING OF DBS CERTIFICATE INFORMATION

The School's policy is to observe the guidance issued or supported by the DBS on the correct use, storage, retention and disposal of certificates and certificate information. The School does not retain copies of the DBS certificate once a decision has been made whether or not to appoint and the relevant information has been recorded on the Single Central Record (see 11 below).

The School will only use certificate information for the specific purpose for which it was requested and:

- ensure that any disclosure information is shredded and
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

13. SINGLE CENTRAL REGISTER OF APPOINTMENTS

Kew College Prep maintains a Single Central Register (SCR) with an entry for all those engaged in Regulated Activity (see 9 above) at the School. In addition, an entry is made for all Governors.

For those in Regulated Activity, the Single Central Register shows the date of the following checks and the initials of the checker where applicable. In relation to every person in Regulated Activity appointed on or after 1 May 2007, the following is entered in the SCR:

- Identity check
- Barred List check
- Prohibition Order check
- Prohibition for Management check where appropriate
- Qualifications where appropriate
- Enhanced DBS check (number and date actual certificate seen)
- Right to work in the UK
- Overseas checks where appropriate

The SCR notes the date on which each check was completed.

In addition, the following checks, whilst not obliged to be recorded on the SCR, are recorded by the School:

- Application form or CV
- Medical declaration
- References

Transfers under TUPE will also be recorded on the SCR to enable a note of all checks to be recorded in one place.

For **School Governors**, the SCR contains the following information:

- Enhanced disclosure
- Barred List check for those in regulated activity
- Identity

- Right to work in the UK
- Prohibition from management of independent schools (from Aug 2015)

(NB. Neither the prohibition from teaching check nor the overseas check are applicable for School Governors).

See also **Supply Staff and Contractors** (below)

See also **Visiting Speakers** (below)

The SCR contains an entry for all current members of **staff** at the school but also retains the record of those who may have left since the start of the academic year. At the end of each academic year, the details of staff leavers is archived and retained until no more than 3 years after the next inspection.

For the Chair of Governors, the procedures detailed in the current ISI Handbook for the Inspection of Schools are followed, and the DBS clearance will be countersigned by the Secretary of State.

Should the School renew any checks these must not overwrite the original entry but comment may be entered under the 'notes' section and copies (where permitted) kept in HR files. The reason for a new check may be for a member of staff who subscribes to the DBS update service, when a staff role changes or on review of the SCR.

14. PRIOR TO START DATE

The Head will see the new employee's staff file and the SCR to ensure that all the requisite checks (i) – (xii) above have been received. All such checks except the Enhanced DBS certificate must have been received before any employee can start work. Should the DBS certificate or a second reference not have been received the Head may allow the employee to start work providing the arrangements in paragraph 8 are followed.

For employees of contractors and visiting speakers, see below.

15. POST APPOINTMENT INDUCTION

There will be an induction programme for all staff newly appointed to the School, regardless of previous experience. See **Staff Induction Procedure**.

16. SUPPLY STAFF

Kew College Prep occasionally uses supply agencies to provide teaching and non-teaching staff. The School will only use a reputable supply agency which has rigorous employment procedures.

The School confirms with the relevant supply agency that the required checks have been carried out to the extent relevant to that person. The SCR must contain the same entries for supply staff as it does for the School's own employees as set out in paragraph 13 above. The SCR will record the date that the confirmation of each check was received from the supply agency.

On arrival at the School for the first time, the supply staff member must show a photographic identity document and a copy of the enhanced DBS certificate.

The School is not required to retain a copy of identity documents on file but should retain the information from the supply agency until after the next inspection.

17. CONTRACTORS

This applies to contractors working in school whilst children are on the premises. Full details are contained in the Schools Management of Contractors Policy.

(i) Employees of contractors

Employees of contractors who are working at the School on a regular basis while children may be present whether during the school day or before/after school activities (eg caterers, cleaners, wrap around care) (3 times within 30 days, ie regulated activity) must have an enhanced DBS (with children's barred list check) clearance, and will be subject to the same checks as School staff with written confirmation supplied by the employing organisation prior to the contractor arriving at the School. In addition, the School must see and verify the original DBS certificate and photographic ID before commencing any work ..

(ii) Self-employed contractors

Self-employed contractors should generally be checked by their professional associations. This is because it is not possible for self-employed people to check themselves but professional associations usually assist, to enable their members to access work. If the self-employed person subscribes to the DBS update service, the School will check identity, view the original certificate and check online for updated information.

(iii) Occasional/temporary contractors

KCSIE states that if a contractor is not in regulated activity (less than 3 days within a 30 day period) then a DBS is not required and nor is internal supervision. However, School policy is that where contractors are employed without a DBS on record, they will be supervised at all times when pupils are on site.

18. VOLUNTEERS

There is no set formula for the vetting of volunteers, unless they **are in regulated activity**. The arrangements for volunteers will vary by individual and activity. The School must, therefore, assess whether the individual will be in regulated activity.

When volunteers are supervised, they do not fall within the definition of regulated activity and so Barred List checks would not be available or required. This is so no matter how frequently or regularly an individual is a volunteer. The exception would be for volunteers carrying out 'personal care'; 'personal care' is always regulated activity. Even where a volunteer is not in regulated activity we will carry out additional checks if deemed necessary.

An unsupervised volunteer, whose presence is frequent and regular, is in regulated activity and the School will obtain an enhanced DBS certificate with Barred List information.

If in doubt the current ISI Handbook on Regulatory Requirements should be consulted or a direct enquiry to ISI made.

‘One-off’ volunteers, for day outings, school concerts and such would not require vetting checks but they should not be unsupervised or must not undertake any kind of personal care.

Existing volunteers (prior to April 2014) should have been checked as required at the time of appointment. The School will consider obtaining new checks if there are concerns.

19. WORK EXPERIENCE

Occasionally past pupils or others come to the School on Work Experience. KCSIE suggests that Barred List checks by the DBS might be required on some people who supervise a child under the age of sixteen on Work Experience Placement. All staff at Kew College Prep who supervise children on Work Experience are in regulated employment and consequently no further checks are required. All Work Experience Placements involving children of school age are risk assessed for the benefit of the child on Work Experience.

In addition, all persons on work experience who are still themselves of school age are fully supervised during their work experience placement and as such do not require a DBS. For other persons on Work Experience Placements, please see “Volunteers” on section 18 above.

20. VISITING SPEAKERS

The *Prevent* statutory guidance requires that the School has clear protocols for ensuring that any visiting speakers who might fall within the scope of the *Prevent* duty, whether invited by staff or pupils, are suitable and appropriately supervised. At Kew College Prep, **Speakers are always supervised.**

Before the visit occurs, identity checks are carried out and the School keeps a record as to how the individual and/or organisation were selected.

Should these checks give rise to any concerns, the Head and the DSL must be informed immediately.

Approved by:	Updated by:
Title: Head	Title: HR Manager
Date: 9 June 2025	Date: 01 Feb 2025



Appendix 1

KEW COLLEGE PREP

Online searches

The School reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. This will include online searches on shortlisted candidates. The online searches the School carries out may include searches of internet search engines, websites and social media platforms. Online searches may be carried out at the shortlisting stage or after an offer of employment has been made (but prior to work commencing). The School will not carry out online searches as part of its initial sift of applications. The School will determine how it approaches online searches on a case by case basis. However, all applicants for a role at the School will be treated consistently with regard to online searches.

In carrying out online searches the School is looking for any publicly available information about an applicant that:

- may be relevant to their suitability to carry out the role for which they have applied
- may be relevant to their suitability to work at the School or in an education setting
- is of a safeguarding nature
- may have an impact on the School's reputation (whether positive or negative)

Any relevant information generated from online searches will be recorded and provided to the interview panel for discussion with shortlisted applicants at interview. Where online searches are undertaken only on the successful applicant, any relevant information generated will be discussed with them prior to employment commencing.

All offers of employment will be conditional upon the School being satisfied that the successful applicant is suitable to work at the School in light of any information generated from online searches. In evaluating any online information for relevance the School will use the following:-

- School Safer Recruitment Policy and Procedure
- whether the information is relevant to the position applied for
- whether the information is relevant to the applicant's suitability to work at the School or in an education setting;
- whether the information could have an impact on the School's reputation (whether positive or negative);
- whether the information calls into doubt the applicant's willingness or ability to uphold the School's commitment to safeguarding and promoting the welfare of children
- the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published
- whether the information reveals a pattern of concerning behaviour
- the relevant circumstances and the explanation(s) offered by the applicant.

For successful candidates, the School will retain relevant information generated through online searches for the duration of the individual's employment and in accordance with its Retention of Records Policy after employment ends. For unsuccessful shortlisted candidates, the School retains the information generated from online searches for six months from the date on which they are informed their application was unsuccessful, after which it will be securely destroyed.