



THE REGENT SECONDARY SCHOOL

Safer Recruitment Policy

Reviewed by the Principal: October 2024

Previous Review: August 2022

Next Review: October 2025

Approved by the Board: October 2024

RATIONALE

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in education. The Regent School is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, the School expects all staff and volunteers to share this commitment.

In line with recent legislation including the UK Children Act 2004, Safeguarding Children and Safer Recruitment in Education Guidance UK DfES/04217/2006, The UK Independent Schools Standards Regulations 2009 (Standards 4, 4A, 4B, 4C), and the UK Safeguarding Vulnerable Groups Act 2006 the school takes very seriously its duty of care for all pupils. To help safeguard and promote the welfare of all its pupils the School is committed to a thorough and consistent Safer Recruitment Policy.

AIMS AND OBJECTIVES

The aim of the Safer Recruitment policy is to help deter, reject or identify people who might abuse pupils or who are otherwise unsuited to working with them by having appropriate procedures for appointing staff. The aims of the School's recruitment 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 ensure that all job applicants are considered equally and consistently;
- to ensure that no job 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;
- to ensure compliance with all relevant UK and Nigerian legislation, recommendations and guidance including the statutory guidance published by the UK Department for Education (DfE), UK Keeping Children Safe in Education - July 2015 (KCSIE), the UK Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the UK 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.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

The School has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the school based on the applicant's abilities, qualifications, experience and merit as measured against the job description and person specification. The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant

safeguarding legislation and statutory guidance (including KCSIE 2015 and Prevent Duty Guidance). If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process. The School aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies at The Regent School.

ROLES AND RESPONSIBILITIES

It is the responsibility of the Board to:

- Ensure the School has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with guidance and legal requirements.
- Monitor the School's compliance with them.

It is the responsibility of the Principal and other Managers involved in recruitment to:

- Ensure that the School operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the School.
- Monitor contractors' and agencies' compliance with this document.
- Promote the welfare of children and young people at every stage of the procedure.

The Board has delegated responsibility to the Principal (teaching staff) and the Registrar (support staff) to lead in all appointments. The Board may be involved in staff appointments and the final decision will rest with the Board.

DEFINITION OF REGULATED ACTIVITY AND FREQUENCY

Any position undertaken at, or on behalf of the School will amount to "regulated activity" if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the "period condition", meaning four times or more in a 30-day period; and
- provides the opportunity for contact with children.

Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

The School is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The School is required to carry out an enhanced DBS check for all Expat staff, who will be engaging in regulated activity. However, the School can also carry out a check on a person who would be carrying out regulated activity but for the fact that they do

not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

RECRUITMENT AND SELECTION PROCEDURE

ADVERTISING

To ensure equality of opportunity, the School will advertise all vacant posts to encourage as wide a field of applicants as possible; normally this entails an external advertisement but for some support staff posts it may just be advertised internally.

Any advertisement will make clear the School's commitment to safeguarding and promoting the welfare of children.

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA).

APPLICATION FORMS

The Regent School uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history). Incomplete application forms will not be shortlisted.

The application form will include the applicant's declaration regarding convictions and working with children. 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 apply for a position at the School. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referred to the police.

There is also a candidate Self Assessment Form which interview candidates complete before they take their interview. This form also contains a section with safeguarding declarations.

JOB DESCRIPTIONS AND PERSON SPECIFICATIONS

A job description is a key document in the recruitment process and must be finalised before taking any other steps in the recruitment process. It will clearly and accurately set out the duties

and responsibilities of the job role. The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job. The person specification will include a specific reference to suitability to work with children.

REFERENCES

References for shortlisted applicants will be sent immediately after shortlisting. The only exception is when an applicant has indicated on their application form that they do not wish their current employer to be contacted at that stage. In such cases, this reference will be taken up immediately after the interview.

All offers of employment will be subject to the receipt of a minimum of **two references** which are considered satisfactory by the School. 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 working with children, then the second reference should be from the employer with whom the applicant most recently worked with children. The referee should not be a relative. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions.

All referees will be asked whether they believe the applicant is suitable 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. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism".

Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

Any discrepancies or anomalies will be followed up. Direct contact by phone will be undertaken with each referee to verify the reference. The School does not accept open references, testimonials or references from relatives.

INTERVIEWS

There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel

to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).

Any information regarding past disciplinary actions or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process if it has not been disclosed on the application form.

At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable.

All applicants invited to an interview will be required to bring evidence of their identity, address and qualifications. Only original documents will be accepted and copies made. Unsuccessful applicant documents will be destroyed six months after the recruitment programme.

OFFER OF APPOINTMENT AND NEW EMPLOYEE PROCESS

PROOF OF IDENTITY, RIGHT TO WORK IN NIGERIA & VERIFICATION OF QUALIFICATIONS AND/OR PROFESSIONAL STATUS

All final stage applicants invited to attend an interview at the School will be required to bring their identification documentation such as passport/visa, birth certificate, driving licence etc. with them as proof of identity/eligibility to work in Nigeria

OVERSEAS CHECKS

Where applicable, the school, in line with the Nigerian Visa regulations will, if applicable, sponsor new foreign nationals.

In addition, applicants who have lived/travelled abroad for more than 3 months will need to obtain a criminal record check from the relevant country. The applicant will not be permitted to commence work until the overseas information has been received and is considered satisfactory by the School.

INDUCTION PROGRAMME

All new employees will be given an induction programme which will clearly identify the School policies and procedures, including the Child Protection and Safeguarding Policy, and the Code of Conduct and make clear the expectations which will govern how staff carry out their roles and responsibilities. All new staff will be expected to complete appropriate child protection and safeguarding training within 7 days of commencing employment at TRSS.

SINGLE CENTRALISED REGISTER OF MEMBERS OF STAFF

In addition to the various staff records kept in the school and on individual personnel files, a single centralised record of recruitment and vetting checks is kept in accordance with the UK Education

(Independent School Standards) Regulations 2014 requirements. This is kept up-to-date and retained by the Administration Manager at The Regent Secondary School. The Single Centralised Register will contain details of the following: -

- All employees who are employed to work at the School;
- all employees who are employed as supply staff to the School whether employed directly or through an agency;
- all others who have been chosen by the School to work in regular contact with children. This will cover volunteers, Board members, peripatetic staff and people brought into the School to provide additional teaching or instruction for pupils but who are not staff members eg: sports coaches etc.

A designated member of SLT (the Registrar) will be responsible for auditing the Single Centralised Register and reporting his/her findings to the Board during the Summer Term meeting.

RECORD RETENTION / DATA PROTECTION

The School is legally required to undertake the above pre-employment checks. 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 Nigeria, medical fitness and qualifications. Medical information may be used to help the School to discharge its obligations as an employer e.g. so that the School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by the School for the duration of the successful applicant's employment with the School. All information retained on employees is kept centrally by the Registrar.

The same policy applies to any suitability information obtained about volunteers involved with School activities.

The Regent Secondary School will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (ie: shredded). The 6-month retention period is in accordance with the UK Data Protection Act 1998.

ONGOING EMPLOYMENT

The Regent School recognises that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. The School will therefore provide ongoing training and support for all staff, as identified through the Annual Review/appraisal procedure.

LEAVING EMPLOYMENT AT THE REGENT SCHOOL

Despite the best efforts to recruit safely, there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. 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 a referral to the Board and any national authorities 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.

CONTRACTORS AND AGENCY STAFF

Contractors engaged by the School must complete the same checks for their employees that the School is required to complete for its staff. The School requires confirmation that these checks have been completed before employees of the Contractor can commence work at the School.

Agencies who supply staff to the school must also complete the pre-employment checks which the School would otherwise complete for its staff. Again, the School requires confirmation that these checks have been completed before an individual can commence work at the School. On attending the school, contractors and agency staff will be required to show an original current identification document that includes a photograph, such as a passport, photo card, driving licence or national identity card. The school shall also keep a formal register of contractors and agency staff, retained in line with the Data Protection Policy.

VISITING SPEAKERS

The Prevent Duty Guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

All visiting speakers will be subject to the School's usual visitors signing-in protocol. This will include signing in and out at Reception, the wearing of a visitor badge at all times and being escorted by a fully vetted member of staff between appointments.

The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School.

On attending the school, visiting speakers will be required to show an original current identification document that includes a photograph, such as a passport, photo card, driving licence or national identity card. The school shall also keep a formal register of visiting speakers, retained in line with the Data Protection Policy.

VOLUNTEERS

The School will request a Nigerian Police check on all volunteers undertaking regulated activity with pupils at or on behalf of the School (the definition of regulated activity set out above will be applied to all volunteers).

Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils.

It is the School's policy that a new certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the School for three consecutive months or more.

In addition, the School will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):

- formal or informal information provided by staff, parents and other volunteers;
- character references from the volunteer's place of work or any other relevant source; and
- an informal safer recruitment interview.

MONITORING AND EVALUATION

The Registrar will be responsible for ensuring that this policy is monitored and evaluated throughout the School. This will be undertaken through formal audits of job vacancies and a yearly Safer Recruitment Evaluation audit which will be presented to the Principal/Bursar to report to the Governing Body.