Recruitment, Selection and Disclosures Policy

Aspire • Believe • Achieve

Staff member responsible:	
Role:	
Revised On:	September 2026
Ratified by governing board:	
Review Due:	September 2027

We have a whole school approach to safeguarding, which is the golden thread that runs throughout every aspect of the school. All our school policies support our approach to safeguarding (child protection). Our fundamental priority is our children and their wellbeing; this is first and foremost.

Scope: All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from school. All new employees and volunteers are required to state that they have read, understood and will abide by this policy and its procedural documents and confirm this by signing the *Policies Register*.

Legal Status: Complies with The Education (Independent School Standards) (England) Regulations and the National Minimum Standards (NMS) for Residential Special Schools (RSS), currently in force.

Monitoring and Review: These arrangements are subject to continuous monitoring, refinement, and audit by the Business Manager and Headmaster, with support from the Deputy Head Pastoral (as DSL).

General: Frewen College School ("the School") is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

The School aims to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010. An entry will be made on the Single Central Register for all current members of staff at the school, the Chair of Governors and all individuals who work in regular contact with pupils including volunteers, supply staff and those employed as third parties. To verify identity, we use the Cabinet Office 'How to prove and verify someone's identity' (currently in force) Good Practice Guides (GPG) version 5.2

The school recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment. The 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;

All queries on the School's Application Form and recruitment process must be directed to the Headmaster An entry will be made on the Single Central Register for all current members of staff at the School, the Chair of Governors and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.

All checks will be made in advance of appointment or as soon as practicable after appointment.

Retention, Security of Records and Data Protection Obligations: The School will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.

The School will comply with its data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice and the Data Protection Policy.

The school is legally required to carry out the pre-appointment checks detailed in this procedure. Staff and prospective staff will be required to provide certain information to the school to carry out the checks that are applicable to their role. The school may also be required to provide certain information to third parties, such as the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA). Failure to provide requested information may result in the school not being able to meet its employment, safeguarding or legal obligations. We will process personal information in accordance with our Data Protection and Confidentiality of Information policies.

Scope: The Recruitment, Selection and Disclosures Policy and Procedure herewith refers and applies to staff directly recruited and employed by the School. In the Education (Independent Schools Standards) (England) Regulations 2014, staff are defined as:

Any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer.

In the case of agency or contract workers, the School should set out their safeguarding requirements in the contract between the organisation and the School must obtain written confirmation from the agency or company that it has carried out the same checks as the School would otherwise perform on any individual working at the school or college (or who will be providing education on the school or college's behalf, including through online delivery). The School conducts identity checks on agency and contract workers on arrival in School and, in the case of agency workers which includes supply staff, the School must be provided with a copy of the appropriate level of DBS check for such staff.

The School will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure – renewed every 3 years, right to work in the UK, barred list, prohibition, qualifications, overseas checks plus, those checks set out in KCSIE (DFE: 2025) as 'pre-employment' checks. The Single Central Register shows these checks have been made and the School carries out its own identity check and has seen a copy of the disclosure (whether or not it discloses any information).

Certain individuals are automatically disqualified from acting in senior management positions within a charity. Whether an individual falls into the category of a senior management position is judged using the following criteria:

- A person who is accountable only to the Chair of Governors, and who carries overall responsibility for the day-to-day management and control of the charity. At Frewen College this is the Headmaster.
- A person who is accountable only to the Headmaster or the Chair of Governors, and who is responsible for the overall management and control of the charity's finances.

Being disqualified means that a person can't take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or 'waived') the disqualification. In respect of contractors, unchecked contractors will under no circumstances be allowed to work unsupervised in School. The School will determine the appropriate level of supervision depending on the circumstances. Any staff who TUPE transfer into the School's staff will be required to undertake the statutory requirements with regard to safer recruitment checks.

If staff are transferred under TUPE (gap of three months or less and information complete) information will be passed to the new employer and a note made on the Single Central Register that details have been accepted under TUPE.

Adverts: Frewen College is clear about the information required when defining the role (through the job or role description and person specification). For any given post, the job description and personal specification includes the skills, abilities, experience, attitude, and behaviours required for the post, its safeguarding responsibilities, including the extent to which they will be in contact with children (engaging in regulated activity). Therefore, Frewen College adverts include our commitment to safeguarding, promoting the welfare of students, also making clear that safeguarding checks will be undertaken.

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:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of the school's senior management team;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months. The school will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken. We do not keep copies of DBS certificates, but simply the certificate number and signature of the recipient;
- ensure that any disclosure information 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.

Safe Recruitment in relation to Boarding: In accordance with the National Minimum Standards for Residential Special schools (RSS DfE: 2024-5), all members of staff households who are aged 16 and over (not on the roll of, nor employed by, the school) and who live on the same premises as boarders, an Enhanced certificate with a check of the Children's Barred List will be obtained from the Disclosure and Barring Service (DBS). For all other persons aged 16 and over, not on the roll of, nor employed by the school, who live on the same premises as boarders, an Enhanced certificate with a check of the Children's Barred List will be obtained.

There is a written agreement between the school and any person aged 16 and over not employed by the school but living in the same premises as children (for example, members of staff households). This specifies the terms of their accommodation, guidance and expectations on contact with pupils, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with children. They are required to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any offence. All persons visiting residential accommodation or staff accommodation (e.g. visitors, outside delivery and maintenance personnel) are kept under sufficient staff supervision to prevent them gaining unsupervised access to boarders or their accommodation.

Application Form: The School will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms. The School will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. Candidates for employed posts will receive a Job Description and Person Specification for the role applied for.

Checks will be made of previous employment history to ascertain satisfactory reasons for any gaps in employment. These checks will then be checked against references and any discrepancies discussed with the candidate.

The successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service ("DBS") for the position and, where appropriate, a check of the Barred List will be undertaken. Any offer of employment will be conditional on obtaining such satisfactory checks. Additionally, successful applicants should be aware that they are required to notify the school immediately if they are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration.

The statutory guidance "Disqualification under the Childcare Act 2006" applies to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

The school takes its responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect his/her suitability to work with children must notify the school immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff and/or successful candidates who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Headmaster for more details.

If the candidate is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.

The School has a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known at the Prevent duty. Schools are required to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Accordingly, as part of the recruitment process, when an offer is made the offer will be subject to a Prevent duty risk assessment [more guidance for schools from the DfE on this can be found at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

If the candidate is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure.

If the candidate is not currently working with children but has done so in the past, the School will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

Invitation to Interview: the School will shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. At least two people will carry out the shortlisting exercise, consider any inconsistencies, look for gaps in employment and reasons given for them and explore all potential concerns.

As part of the shortlisting process, the School will consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

Shortlisted applicants will then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail.

Shortlisted candidates should be asked to complete a self-declaration form in relation to their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. Applicants will be asked to sign a declaration confirming that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

The School will obtain references prior to interview. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview.

All formal interviews will have a panel of at least two people chaired by the Headmaster/Bursar or another designated senior member of staff. It is recommended best practice that at least one person on the appointment panel will have undertaken safer recruitment training. The Chair of Governors should chair the panel for the Bursar's/Head's appointment. The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Chair as to whether or not an interviewer should withdraw from the panel. Should the Chair have a conflict of interest, the Vice Chair shall decide whether the Chair should withdraw from the panel.

Where practicable, The interview will be conducted in person and the areas which it will explore will include suitability to work with children including where appropriate, any discussion of information shared by a candidate in their self-declaration form.

All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.
The School requests that all candidates invited to interview also bring with them:

- A current driving licence including a photograph or a passport and a full birth certificate;
- A utility bill or financial statement issued within the last three months showing the candidate's current name and address;
- Where appropriate any documentation evidencing a change of name;
- Where applicable, proof of entitlement to work and reside in the UK.

Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.
Candidates with a disability who are invited to interview should inform the School of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

Conditional Offer of Appointment: Pre-Appointment Checks: Any offer to a successful candidate will be conditional upon:

- Receipt of at least two satisfactory references (if these have not already been received);

- Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK (if not already received);
- A satisfactory enhanced DBS check and, if appropriate, a check of the Children's Barred List maintained by the DBS;
- For a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State or any sanction or restriction imposed (that remains current) by the historic General Teaching Council for England before its abolition in March 2012. Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:
  - Planning and preparing lessons and courses for pupils;
  - Delivering and preparing lessons to pupils;
  - Assessing the development, progress and attainment of pupils; and
  - Reporting on the development, progress and attainment of pupils;
- Verification of professional qualifications, including Qualified Teacher Status, where appropriate;
- Verification of successful completion of statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999);
- Where the successful candidate has worked or been resident overseas: Such further checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing the School with proof of his/her past conduct as a teacher in the form of a letter of professional standing from the professional regulating authority in the country in which s/he has worked;
- Evidence of satisfactory medical fitness;
- Confirmation that the candidate is not disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006" **OR** Receipt of a signed Self-Declaration form showing that the candidate is not disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006;
- Where the successful candidate will be taking part in the management of the school, a check will be carried out under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Management Team and teaching heads of department; and
- For a candidate to be employed into a senior management position as set out above under "Scope of this Policy", receipt of a signed "senior charity manager positions: automatic disqualification declaration" confirming that the candidate is not disqualified from acting in a senior management position for a charity in accordance with the automatic disqualification rules for charities.

It is the School's practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by the School in strictest confidence and processed in accordance with the Recruitment Privacy Notice and Data Protection Policy. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed workload, extra-curricular activities, and/or layout of the School.

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

References: The School will seek the references referred to above for shortlisted candidates (including internal applicants) and will approach previous employers for information to verify particular experience or qualifications, before interview. One of the references must be from the applicant's current or most recent employer. References must be received by a senior person with appropriate authority. If the candidate does not wish the School to take up references in advance of the interview, they should notify the School at the time of applying.

The School will ask all referees if the candidate is suitable to work with children and to provide facts of any substantiated safeguarding concerns or allegations that meet the harm threshold set out in Part 4 of the statutory guidance 'Keeping Children Safe in Education'. Substantiated allegations that meet the harm threshold should be included in references. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated, or malicious should not be included in any reference.

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials. The School will verify all references. Where references are received electronically, the School will ensure they originate from a legitimate source.

The School will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.

The purpose of collecting references is to obtain objective and factual information to support the appointment decision. The use of a pro forma can help achieve this. Open testimonials are not a substitute for closed reference requests. Job descriptions and person specifications should always be provided so that the referees can comment on the individual's suitability for the specific post in question. Ideally all references should be taken up on all shortlisted candidates, including internal ones, before interviewing so that any concerns can be explored further with referee and subsequently investigated further with the individual at interview.

Every reference request for jobs involving contact with children should ask the following:

- Referees relationship with candidate – how they know them and how long they have known them;
- Whether the referee is satisfied that the person has the ability and is suitable to undertake the job in question, based on the information provided in the job description and person specification;
- Evidence (ask for specific comments about applicant's suitability and for those to be justified);
- Whether there are any concerns about the candidates suitability to work with children, and, if there are, the reasons why the referee believes this person to be unsuitable;
- Factors that are specific to the post, i.e. knowledge and understanding of effective classroom management strategies, ability to work as a team;
- Confirmation of persons current job title and salary;
- Specific verifiable comments about applicants performance and conduct;
- Details of any disciplinary procedures in which the sanction is current;
- Details of any disciplinary procedures the applicant has been subject to involving issues related to safety and welfare of children or young people, including any in which the sanction has expired;
- Details of any allegations or concerns that have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour toward children or young people, and the outcome of these concerns. e.g. whether the allegations or concerns were investigated, the conclusion and how the matter was resolved.

On receipt of these references any anomalies or areas that are vague should be thoroughly investigated further. The referee should, (ideally in writing), seek clarification from the referee or further information, or should telephone and ask to be provided with written answers as appropriate. A written record of any telephone conversation must be kept with the personnel notes. Any information about past disciplinary action or allegations should be considered in the context of the individual case. Cases in which an issue was unsatisfactorily resolved some time ago or an allegation was determined to be unfounded or did not require any formal sanctions, and in which no further issues have been raised, are less likely to cause concern than more serious or recent allegations, or issues that were not resolved satisfactorily. A history of repeated concerns or allegations over time should not be ignored and you should contact your personnel department for more advice. We have developed a code of practice for writing and requesting references.

During Interview: To safeguard children the interview panel should explore:

- The candidate's attitude toward children. This may be assessed through their personal statement and through questions that probe their values, beliefs and ethics;
- The candidate's motivation to work with children. Questions on how they have applied their vision for education, and learning and development of the child and young person can help you assess their motivation;
- Their ability to form relationships and retain personal boundaries. This should be assessed through focused questions and complementary activities, such as group exercises or occupational personality questionnaires;
- Their emotional resilience in working with challenging behaviours and their attitudes in managing discipline and towards authority. Questions asking them to draw on previously difficult situations and how they managed these will help you assess this;
- Their ability to support the authority/establishment's agenda for safeguarding and promoting the welfare of children. Clarification on their understanding of the Schools' Organisations/County's view on child protection policies and procedures, questions that ask them to explain when and how they have had to work within such procedures and policies;
- Gaps in the candidate's employment history and explanation of repeated changes in career must be discussed and clarified;
- Concerns or discrepancies arising from the information provided by the candidate or referees;
- If for any reason references have not been provided before the interview the candidate should be given the opportunity to declare/discuss anything that may come to light on the collection of references;
- Ask the candidate if they wish to declare anything in light of the requirement for DBS checks to be made.

The interview panel will identify appropriate safeguarding questions and activities in line with the job role, the local safeguarding expectations and the current version of KCSIE.

Criminal Records Policy: The School will refer to the Department for Education ("DfE") document, 'Keeping Children Safe in Education' and any amended version in carrying out the necessary required DBS checks.

The School complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request, or accessed here: https://www.gov.uk/government/publications/dbs-code-of-practice.

There are limited circumstances where the school will accept a check from another educational institution which are as follows:
This is where the new member of staff ("M") has worked in:

- A school or a maintained school in England in a position which brought M regularly into contact with children or young persons;
- A maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or
- An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons, during a period which ended not more than three months before M's appointment.

In these circumstances the school may apply for a disclosure but is not required to do so. A new, separate barred list check will be obtained.

DBS Update Service: Where an applicant subscribes to the DBS Update Service the applicant must give consent to the school to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required.

If Disclosure is Delayed: A short period of work is allowed under controlled conditions, at the Headmaster's discretion. However, if an 'enhanced disclosure' is delayed, a Headmaster may allow the member of staff to commence work:

- Without confirming the appointment;
- After a satisfactory check of the barred list if the person will be engaging in regulated activity and all other relevant checks (including any appropriate prohibition checks) having been completed satisfactorily;
- Provided that the DBS application has been made in advance;
- With appropriate safeguards taken (for example, loose supervision);
- Safeguards reviewed at least every two weeks by the Headmaster and member of staff;
- The person in question is informed what these safeguards are; and
- It is recommended, but is not a requirement, that a note is added to the single central register and evidence kept of the measures put in place.

Employment History and References: We always try to obtain references before interview, allowing any concerns raised to be explored further with the referee and taken up with the candidate at interview. Frewen College:

- does not accept open references e.g. to whom it may concern;
- does not rely on applicants to obtain their reference;
- ensures any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or school based, the reference is to be confirmed by the headteacher as accurate in respect of any disciplinary investigations);
- obtains verification of the individual's most recent relevant period of employment where the applicant is not currently employed;
- secures a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), and if the applicant has never worked with children, then ensures a reference from their current employer;
- always verifies any information with the person who provided the reference;
- ensures electronic references originate from a legitimate source;
- contacts referees to clarify content where information is vague or insufficient information is provided;
- compares the information on the application form with that in the reference and takes up any discrepancies with the candidate;
- establishes the reason for the candidate leaving their current or most recent post, and
- ensures any concerns are resolved satisfactorily before appointment is confirmed.

When asked to provide references, Frewen College ensures references it provides confirm our satisfaction with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold. This does not include information about concerns/allegations which are unsubstantiated, unfounded, false, or malicious. In respect to low-level concerns, we comply with Part Four of KCSIE (currently in force) and the ISSR (currently in force), along with our low-level concern policy, which is publicly available on the school website. We regard references as an important part of the recruitment process and endeavour to provide them in a timely manner. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious are not included in any reference provided by Frewen College.

Individuals who have lived or worked outside the UK: Such individuals must undergo the same checks as all other staff at Frewen College, including obtaining (via the applicant) an enhanced DBS certificate (including children's barred list information) even if the individual has never been to the UK. Additionally, we make any further checks we think appropriate, so that relevant events what occurred outside of the UK can be considered. Following the UK's exit from the EU, Frewen College applies the same approach for any individuals who have lived or worked outside the UK regardless of whether it was in an EEA country or the rest of the world. These checks include, where available, criminal records checks for overseas applicants (please refer to the Home Office guidance found on GOV.UK.

We seek to obtain a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Whilst the safeguarding and qualified teacher status (QTS) processes are different it is likely that this information will be obtained from the same place therefore applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body.

Where this information is not available, Frewen College seeks alternative methods of checking suitability, and may undertake a risk assessment and additional reference that supports an informed decision on whether to proceed with the appointment. Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, Frewen College always considers the circumstances that led to the restrictions being imposed when considering a candidate for employment. We refer to the DfE guidance: Recruit teachers from overseas.

Not all countries provide criminal record information, and where they do, the nature of this information varies from country to country. Frewen College bears this in mind and is also aware that the criteria for disclosing offences in other countries often have a different threshold than those in the UK. We refer to the Home Office guidance on criminal record checks for overseas applicants.

Some overseas qualified teachers can apply to the TRA for the award of qualified teacher status (QTS) in England. Frewen College, however, notes that holding a teaching qualification (wherever it was obtained) does not provide assurances that a candidate is suitable to work with children, or that they have not been found guilty of any wrongdoing or misconduct.

Agency and Third-Party Staff (Supply Staff): Frewen College obtains written notification from any agency, or third-party organisation, that they have carried out the checks on an individual who will be working within the school that we would otherwise perform. In respect of the enhanced DBS check, Frewen College ensures that written notification confirms the certificate has been obtained by either the employment business or another such business. Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at Frewen College, which has disclosed any matter or information, or any information was provided to the employment business, Frewen College always obtains a copy of the certificate from the agency. Additionally, the agency or third-party must obtain a children's barred list check by obtaining an enhanced DBS certificate with children's barred list information, prior to appointing the individual. Frewen College then also checks that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors: Where Frewen College uses contractors to provide services, their safeguarding requirements are always set out in the contract between the organisation and the school. We ensure that any contractor, or any employee of the contractor, who is to work at the school has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an

enhanced DBS check (not including children's barred list information) is required. Where the contractor does not have opportunity for regular contact with children, Frewen College decides on whether a basic DBS disclosure would be appropriate.

Under no circumstances does Frewen College allow a contractor on whom no checks have been obtained to work unsupervised or engage in regulated activity relating to children. At Frewen College, we recognise our responsibility for determining the appropriate level of supervision depending on the circumstances. If an individual working at the school is self-employed, we obtain the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account. We will always check the identity of contractors on arrival at the school.

Trainee/Student Teachers: All such teachers have checks made on them as would be the case for any other member of staff working within Frewen College.

Visitors: Frewen College recognises that there are different types of visitors. There are those with professional roles i.e. educational psychologists, social workers etc., those connected with the building, grounds maintenance, relatives or other visitors attending an activity in the school. We do not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Headmaster uses his professional judgement about the need to escort or supervise such visitors.

For visitors to the school in a professional capacity, Frewen College checks their ID and ensures that they have had the appropriate DBS check (or that their employers have confirmed that their staff have appropriate checks. In these circumstances, we do not ask to see the certificate). We recognise that, whilst external organisations can provide a varied and useful range of information, resources and speakers that can enrich our educational provision, we carefully consider the suitability of any external organisations. Arrangements for individuals coming onto the school's premises are set out in our Safeguarding (Child Protection) Policy, including an assessment of the educational value, age appropriateness of what is going to be delivered and whether relevant checks will be required. (Please also refer to our visiting speakers' policy).

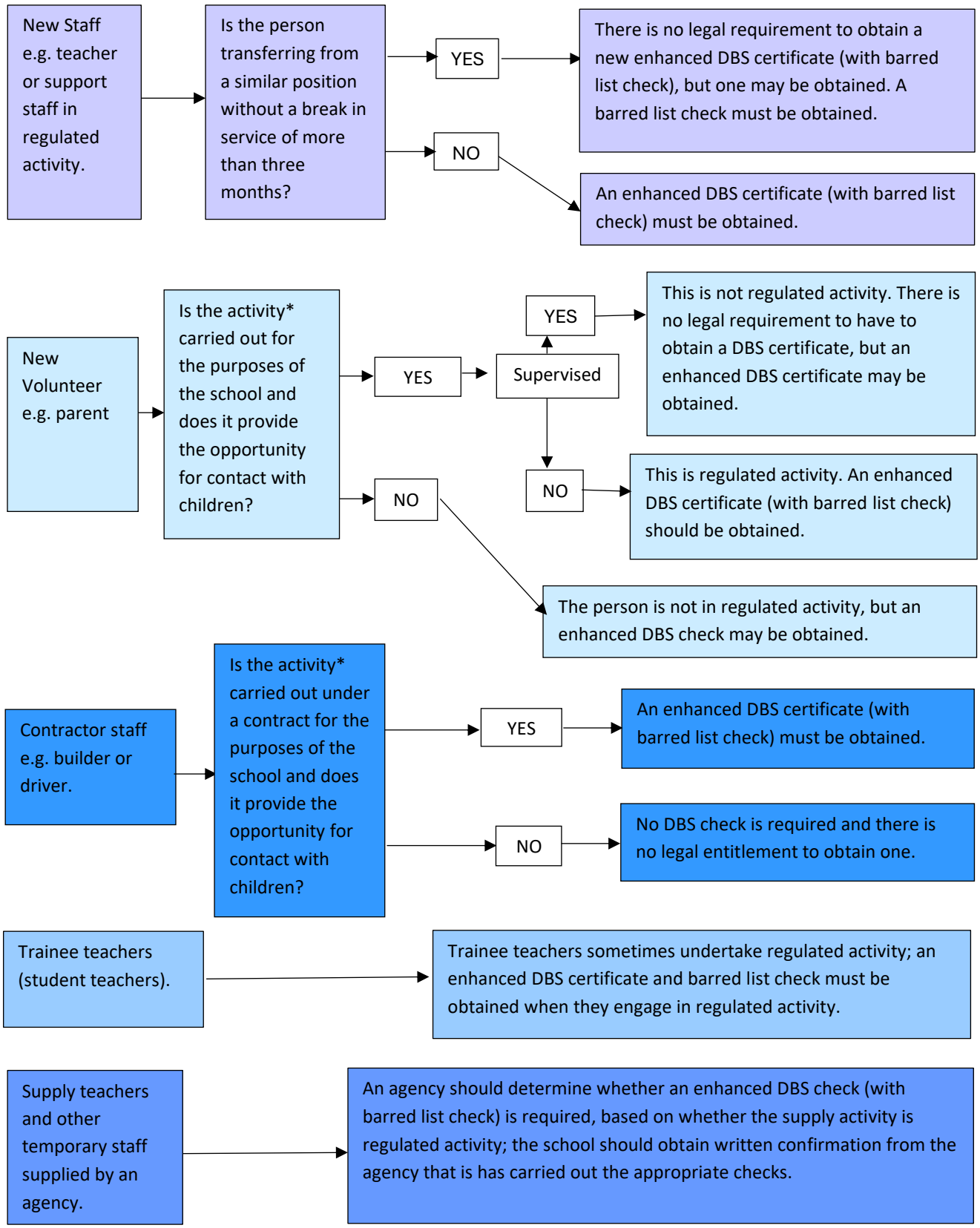
Volunteers: Appropriate checks are made on all our volunteers, who play an important role and are often seen by our pupils as being safe and trustworthy adults. We undertake a written risk assessment and exercise our professional judgement and experience when deciding what checks, if any, are required. Our risk assessment considers:

- the nature of the work with children, especially if it will constitute regulated activity, including the level of supervision;
- what Frewen College knows about the volunteer, including formal or informal information offered by staff, parents or other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability;
- whether the role is eligible for a DBS check, and if it is, the level of the check, for volunteer roles that are not in regulated activity. Details of the risk assessment are recorded.

We obtain an enhanced DBS check (including children's barred list information) for all volunteers who are new to working in regulated activity with children, including where they are unsupervised and teach or look after children in our boarding houses or medical centre. For the supervision of volunteers, we have regard to the statutory guidance issued by the Secretary of State (replicated at Annex E of KCSIE (currently in force)). Our supervision of volunteers is carried out by a person who is in regulated activity relating to children, regular and day to day, and reasonable in all circumstances to ensure the protection of students. To reiterate, we ensure that both existing and new volunteers have a DBS check at the appropriate level to the volunteering role.

Adults who Supervise Children on Work Experience: Where we organise work experience placements, we ensure that the placement provider has policies and procedures in place to protect our pupils from harm. Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. We consider the nature of the supervision and the frequency of the activity being supervised to determine whether checks are necessary, and we comply with KCSIE (DfE: 2025) in regards to adults who supervise children on work experience. Where young people are conducting work experience themselves, this would not usually require vetting checks, and we would as such consider them to be volunteers, and follow these procedures as such. This may include vetting checks if the young person engages in a regulated activity. With reference to our pupils staying with host families (homestay) and private fostering (LA notification when identified), we also comply with KCSIE (currently in force) and part 9 of the Children Act 1989.

Ensuring the Ongoing Safeguarding of Pupils and Frewen College's Legal Reporting Duties as an Employer: Our safeguarding requires a continuing commitment from all staff to ensure that the safety and welfare of our pupils is embedded in all of Frewen College's processes and procedures, and consequently enshrined in our ethos. Parts 1 and 2 of KCSIE (currently in force), along with our Safeguarding (Child Protection) Policy, Low-Level Concerns Policy and Staff Behaviour Policy (Staff Code of Conduct) provide us with a coordinated, whole school approach to safeguarding. This ongoing vigilance maintains an environment that deters and prevents abuse at Frewen College and challenges any inappropriate behaviour. We fully appreciate that the Senior Management and Senior Leadership team must create the right culture and environment, so that all our staff and volunteers feel comfortable discussing matters both within, and where it is appropriate, outside of the workplace, which may have implications of the safeguarding of our pupils.


New Staff e.g. teacher or support staff in regulated activity.
Is the person transferring from a similar position without a break in service of more than three months?
YES
There is no legal requirement to obtain a new enhanced DBS certificate (with barred list check), but one may be obtained. A barred list check must be obtained.
NO
An enhanced DBS certificate (with barred list check) must be obtained.
New Volunteer e.g. parent
Is the activity* carried out for the purposes of the school and does it provide the opportunity for contact with children?
YES
Supervised
YES
This is not regulated activity. There is no legal requirement to have to obtain a DBS certificate, but an enhanced DBS certificate may be obtained.
NO
This is regulated activity. An enhanced DBS certificate (with barred list check) should be obtained.
NO
The person is not in regulated activity, but an enhanced DBS check may be obtained.
Contractor staff e.g. builder or driver.
Is the activity* carried out under a contract for the purposes of the school and does it provide the opportunity for contact with children?
YES
An enhanced DBS certificate (with barred list check) must be obtained.
NO
No DBS check is required and there is no legal entitlement to obtain one.
Trainee teachers (student teachers).
Trainee teachers sometimes undertake regulated activity; an enhanced DBS certificate and barred list check must be obtained when they engage in regulated activity.
Supply teachers and other temporary staff supplied by an agency.
An agency should determine whether an enhanced DBS check (with barred list check) is required, based on whether the supply activity is regulated activity; the school should obtain written confirmation from the agency that is has carried out the appropriate checks.

Appendix 1 - Policy on the Recruitment of Ex-Offenders

The School will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. The School makes appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar him/her 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 candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for the School to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for the School to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful for the School to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the statutory guidance "Disqualification under the Childcare Act 2006".

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. The School will report the matter to the Police and/or the DBS if:

- the School receives an application from a disqualified person;
- is provided with false information in, or in support of, an applicant's application; or
- the School has serious concerns about an applicant's suitability to work with children.

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;
- whether the conviction or caution is 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020 (if yes, it will not be taken into account);
- 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;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

If the post involves regular contact with children, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence, serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving.

APPENDIX 2: THE SINGLE CENTRAL RECORD

The school maintains an electronic single central record of pre-appointment checks, referred to in the Regulations as the register. Our single central record covers the following people: all staff, including teacher trainees on salaried routes; supply staff who work at the school and the headmaster.

The bullet points below set out the minimum information that is recorded in respect of staff members (including teacher trainees on salaried routes). The record indicates whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check;
- a barred list check;
- an enhanced DBS check/certificate;
- a prohibition from teaching check;
- a section 128 check (for management and co-ordinator positions for independent schools);
- further checks on people who have lived or worked outside the UK; this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions;
- a check of professional qualifications, where required;
- a check to establish the person's right to work in the United Kingdom.

In addition, we record whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18. For supply staff we also include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff. Whilst there is no statutory duty to include on the single central record details of any other checks, we also record other relevant information. For example, checks for childcare disqualification, volunteers, and safeguarding and safer recruitment training dates. We also record the name of the person who carried out each check.

Although we do not need to retain copies of DBS certificates in order to fulfil our duty of maintaining the single central record, we may choose to hold copies of these, but this will be for no longer than six months. Any copies of other documents used to verify a successful candidate's identity, right to work and required qualifications will be kept in their personnel file. Individuals who have lived or worked outside the UK will undergo the same checks as all other staff in the school. In addition, the school will make any further checks we feel appropriate so that any relevant events that occurred outside the UK can be considered.

APPENDIX 3: LIST OF VALID IDENTITY DOCUMENTS

Group 1: primary identity documents

- current valid passport
- biometric residence permit (UK)
- current driving licence (photocard with paper counterpart; full or provisional; UK/Isle of Man/Channel Islands and EU)
- birth certificate (UK & Channel Islands; issued at the time of birth (within 42 days of date of birth); full or short form acceptable including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces)
- adoption certificate (UK and Channel Islands)

Group 2a: trusted government documents

- current driving licence (paper version; UK/Isle of Man/Channel Islands and EU; full or provisional)
- current driving licence (photocard; all countries; full or provisional)
- current non-UK driving licence (valid for up to 12 months from the date the applicant entered the UK)
- birth certificate (UK and Channel Islands; issued at any time after the date of birth by the General Registrar Office/ relevant authority i.e. Registrars)
- marriage/civil partnership certificate (UK and Channel Islands)
- HM Forces ID card (UK)
- firearms licence (UK, Channel Islands and Isle of Man)

Group 2b: Financial and social history documents

- mortgage statement (UK or EEA) **
- bank/building society statement (UK and Channel Islands or EEA) *
- bank/building society account opening confirmation letter (UK)*
- credit card statement (UK or EEA) *
- financial statement - e.g. pension, endowment, ISA (UK)**
- P45/P60 statement **(UK and Channel Islands)
- council tax statement (UK and Channel Islands) **
- work permit/visa (UK; valid up to expiry date)
- letter of sponsorship from future employment provider (non-UK/non-EEA only; valid only for applicants residing outside the UK at the time of application; must be valid at time of application)
- utility bill (UK; not mobile telephone bill) *
- benefit statement - e.g. child benefit, pension (UK)*
- a document from central or local government/government agency/local authority giving an entitlement - e.g. from the Department for Work and Pensions, the Employment Service, HM Revenue & Customs, Job Centre, Job Centre Plus, Social Security (UK and Channel Islands) *
- EU national ID card (must be valid at time of application)
- cards carrying the PASS accreditation logo (UK and Channel Islands; must be valid at time of applications)
- letter from Headmaster (for 16-19-year olds in full time education. This is only used in exceptional circumstances if other documents cannot be provided; must be valid at time of application).

Note: If a document in the list of valid identity documents is:

Appendix 1 denoted with * - it should be less than three months old

Appendix 2 denoted with ** - it should be less than 12 months old

APPENDIX 4: REGULATED ACTIVITY

Regulated Activity: the full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government has produced a Factual note on regulated activity in relation to children:
scope.

Regulated activity includes:
(a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

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

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

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

APPENDIX 5: DISQUALIFICATION UNDER THE CHILDCARE ACT 2006 - AMENDED 2018

A change in the law means that Disqualification by Association will only apply on domestic premises. However, Disqualification under the Childcare Act 2006, still applies to staff themselves. schools must no longer ask about the cautions or convictions of someone living or working in their household. (It should be noted that other statutory guidance may be relevant where the third party lives on the school premises, such as in boarding schools.)

Main Points:

- Disqualification by Association now only applies in domestic settings, not schools.
- Disqualification under the Child Care Act still applies to staff themselves who work in a childcare capacity, whether paid, volunteer or are on work placements.
- Relevant staff are those working in childcare, or in a management role because they are: working with reception age children at any time; or working with children older than reception until age eight, outside school hours.
- The school complies with statutory guidance in *Keeping Children Safe in Education (DfE, September 2024)* and ensures that staff working in childcare provision (including before and after school provision for children under 8) and those directly concerned in the management of such provision are not disqualified under the Childcare (Disqualification) Regulations 2009 (as amended).Relevant staff are required to complete a Childcare Disqualification Self-Declaration prior to appointment and periodically thereafter. Any disclosures are risk assessed and managed in line with statutory guidance.
- schools are free to decide how to bring these requirements to the attention of their staff. As a means of making staff aware of their duty to provide such information, they may, for example, choose to include a section in the school's safeguarding policy, or another policy document, or by means of an addition to new staff members' contracts of employment. schools should draw this guidance to the attention of their staff and the information provided by Ofsted referenced in this guidance.
- schools will need to review any historic data collected and destroy any information which is no longer required.
- Ofsted and the Independent school Inspectorates will check the management of Disqualification under the Childcare Act as part of their routine school inspection process.

What should schools do:

- Inform staff of the changes and record the date that they were informed; a letter, or email might be best.
- Ensure that this information is included in the Safeguarding and Child Protection Policy; and in the Safer Recruitment Policy
- Identify and record which staff are covered by Disqualification under the Childcare Act 2006 (including volunteers and people on work placements).
- Ask relevant staff to self-declare that they are not Disqualified under the Childcare Act 2006. (A form is not necessary). [An Enhanced DBS Certificate will confirm this for new staff; for existing employees schools could consider using the DBS Update Service to supplement any employee self-declaration.]
- Remind all staff about the expectation to inform the school where their relationships and associations, both within and outside of the workplace (including online), may have implications for the safeguarding of children in the school.
- Remind all staff that if their circumstances change, they must inform the school. (Decide where to put this in writing: Staff Code of Conduct and/or in staff contracts.)
- Decide whether these self-declarations will be kept on the Single Central Register, or elsewhere.
- Review any historic data collected and destroy any information which is no longer required.

APPENDIX 6: PRE-APPOINTMENT AND ANNUAL DISQUALIFICATION UNDER THE CHILDCARE ACT 2006 - AMENDED 2018

This form is to be completed by all staff and volunteers before commencement of employment and on an annual basis at the commencement of the autumn term.

Name (Please print): _____

Position Applied For: _____

Important – Please read in full before completing the declaration

Please answer the questions below to the best of your knowledge and sign the declaration at the end of this form. Please note that you must answer all questions for yourself. You do not need to provide details about any protected cautions or protected convictions as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013).

Please answer each question below by circling Yes or No.

Questions relating to you:

Have you been cautioned or convicted of any offences against a child?	**YES**	**NO**
Have you been cautioned or convicted of any violent or sexual offences against an adult?	**YES**	**NO**
Have you been barred from working with children by the Disclosure and Barring Service?	**YES**	**NO**
Have your children been taken into care?	**YES**	**NO**
Have your children been, or are your children, the subject of a child protection order?	**YES**	**NO**
Has a court order been made in respect of a child under your care?	**YES**	**NO**
Have you been refused registration or had registration cancelled in relation to childcare or a children's home or have you been disqualified from private fostering?	**YES**	**NO**

If you have answered YES to any of the questions above, please provide further information below:

I have answered yes to one or more of the questions above because

I understand my responsibility to safeguard children and am aware that I must notify the Headmaster regarding anything that may affect my suitability, or that of anyone living in my household. I give permission for you to contact any previous settings, local authority staff, the police, the DBS, or any medical professionals, to share information about my suitability to care for children.

Signed: _____ Date: _____

To be completed by the Headmaster:

I have reviewed the answers provided above and no further action is required.

Signed: _____ Date: _____

Or:

I have reviewed the answers provided above and the following action has been taken (continue on additional sheet as required):

Signed: _____ Date: _____