RADLEY SCHOOLS GROUP

Kitebrook PREPARATORY SCHOOL

Policy 5.11

Kitebrook Preparatory School Safer Recruitment Policy

(Including boarding, day and EYFS pupils)

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Kitebrook Preparatory School Policy 5.11 Safer Recruitment Policy

1.0 Purpose and Scope

1.1 The purpose of this policy is to provide a clear framework for all employees responsible for recruitment in the Radley Schools Group with the sole aim of identifying, deterring, and rejecting people who might abuse children or are otherwise unsuited to working with children by having appropriate procedures for appointing staff.

1.2 Recruiting people who are wrong for our Schools can lead to increased staff turnover, increased costs and lowering of morale in the existing workforce. Such people are likely to be discontented, unlikely to give their best and end up leaving voluntarily or involuntarily when their unsuitability becomes evident. They will not offer the flexibility and commitment that our Schools require and seek.

1.3 Adherence to this policy will ensure that our Schools recruit and select the best applicants for employment who are engaged and committed. The Group aims to ensure that both safe and fair recruitment & selection are conducted at all times. Safeguarding and promoting the welfare of children and young people and creating a safe environment for them are integral factors in recruitment & selection.

2.0 Roles and responsibilities

2.1 The Group HR Department, with the support of the Council, is responsible for ensuring effective policies and procedures are in place in relation to safer recruitment for all Group staff and volunteers in accordance with DfE guidance and requirements.

2.2 It is the responsibility of all staff involved in any level of recruitment or at any stage of the recruitment process to :

- Ensure that the Group operates Safer Recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the Group.
- Monitor contractors' and agencies' compliance with this document and ensure details of all contractors and third parties are registered with the HR department.
- Promote the welfare of children and young people at every stage of the recruitment process.

3.0 Audience

3.1 This policy applies to all employees of the Prep Schools of Radley Schools Group.
Group policies are accessible on the Staff Intranet and can also be directly obtained from the HR Department.

4.0 The Group recognises its commitments under:

- The Independent School Standards
- The Safeguarding Vulnerable Groups Act (2006) as amended by the Protection of Freedom Act (2012)
- Working Together to Safeguard Children (2023) (WTSC)
- The Prevent duty guidance (2024)
- Keeping Children Safe in Education (KCSIE)
- The National Minimum Standards for boarding schools and will comply with these regulations and statutory guidance.

5.0 AIMS AND OBJECTIVES

5.1 The Group 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 values, abilities, qualifications, experience

and merit as measured against the Job Description and Person Specification.

5.2 The recruitment and selection of employees will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation. All safer recruitment checks will be done in accordance with safeguarding and employment legislation requirements.

5.3 If a colleague involved in the recruitment process has a close personal or familial relationship with an applicant, or any other actual or perceived conflict of interest, they must declare this as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

6.0 RECRUITMENT AND SELECTION OF STAFF

6.1 Advertising

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

6.1.2 All documentation relating to applicants will be treated confidentially in accordance with Data Protection laws.

6.2 Application Forms

6.2.1 The Group uses its own application form across all its schools. All applicants for employment are required to complete an application form which contains questions about their academic and employment history and their suitability for the role. The application must be completed in full. CVs may be supplied but will not be accepted as a substitute for an application form - CVs will only be accepted alongside a fully completed application form.

6.2.2 All applicants are required to fully account for any gaps or discrepancies in employment history and any discrepancies will be explored at interview and may be explored with referees.

6.2.3 All applicants must provide accurate answers within their application. Applicants should be aware that providing false information is an offence and could result in the application being rejected or disciplinary action being taken if the applicant has been selected. Shortlisted candidates will be required to physically sign a hard copy of their application at the point of interview to confirm that the information given is accurate.

6.2.4 Applicants who may pose a risk to children may be referred to the police and other professional regulatory bodies (e.g. Teaching Regulation Agency; Disclosure and Barring Service).

6.3 Shortlisting and Pre-Employment Checks

6.3.1 Applicants will be short-listed against the requirements of the job description and person specification. The same people should carry out the short-listing and the interviews and there should be at least two people. The outcome of the short-listing process will be retained.

6.3.2 The short-listing panel are responsible for scrutinising the application forms and identifying any gaps in employment or other areas that may affect an applicant's suitability to work with children and young people. A satisfactory explanation for any concerns must be obtained from the applicant during the interview process. Due to limited resources and the large number of applicants often received, the Group will only notify the shortlisted candidates of the outcome of their application.

6.3.3 Shortlisting will sometimes take place before the closing date, when large numbers of suitable applications are received or at times of high demand for teaching staff. This will be noted on the advertisement.

6.3.4 Information regarding the disclosure of a criminal record must be made in confidence by providing a supplementary sheet within a sealed envelope for the attention of Radley Schools Group Head of HR or the Head of the School.

6.3.5 Applicants with a disability are invited to inform the Group so that reasonable adjustments and arrangements can be made to assist them with the application and interview process. All shortlisted applicants will need to undergo an online check (including and not limited to social media websites) in accordance with the KCSIE guidelines published in September, and will be asked to supply additional documents as outlined below.

6.4 Job Descriptions and Person Specifications

6.4.1 A Job Description and Person Specification will be produced prior to taking any other steps in the recruitment process.

6.4.2 The Job Description will clearly and accurately set out the duties and responsibilities of the job role, including any safeguarding responsibilities, and a commitment to safeguarding and promoting the welfare of children.

6.4.3 The Person Specification will detail the skills, experience, abilities and expertise that are required to do the job.

6.5 References

6.5.1 References for short-listed applicants will be requested in advance of an interview using the Group's Standard Reference Form and will be explored further with the referee and applicant during the interview if necessary. If the applicant withholds permission without a valid reason, the invitation to interview will be withdrawn.

6.5.2 Two written references must be provided. A reference from the applicant's current or most recent employer must be provided. References will always be sought and obtained directly from the referee. Their purpose is to provide objective and factual information to support appointment decisions. Any discrepancies, anomalies or information which raises a concern will be followed up.

6.5.3 The Group does not accept open references, testimonials or references from relatives. References should be from a senior person with appropriate authority.

6.5.4 Referees will be advised that:

- They have a legal liability for references and the reference should contain no material misstatement or omission;
- The content of the references may be discussed with the applicant;
- The referee may be contacted later for clarification on any part of the reference.

6.6 Pre-interview declarations

6.6.1 Shortlisted candidates are asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children, as prescribed by KCSIE.

6.7 Interviews

6.7.1 There will be a face-to-face interview either in person or via another method e.g. Zoom. In all cases, the interview panel will seek to satisfy themselves of the applicant's suitability to work in a day and boarding environment.

6.8 For Teaching Posts:

- Senior Leadership posts, the panel will include the Head and at least one member of the Group

office leadership team - Head appointments will include the CEO and at least one member of the Council.

- For all academic staff, it would be usual for the Head and at least one other senior member of staff to be involved in the selection process, at least one of whom will have undergone Safer Recruitment training;
- In most cases, applicants will be required to teach one or two lessons;
- All applicants will have an opportunity to tour the School, meet members of staff and ask questions. Applicants will be informed in advance of what will be required and at what stage during the interview process this will take.

6.9 For Non-Teaching Posts:

- The interview panel will comprise of at least the Head and appropriate Line Manager, one of whom will have undergone Safer Recruitment training;
- Dependent on the post, there may be a separate assessment of ability/skills required for the role;
- All applicants will have an opportunity to tour the School, meet with other members of staff and ask questions. Applicants will be informed in advance of what is required and at what stage during the interview process this will take place.
- In addition to assessing and evaluating the applicant's suitability for the post, the interview panel will also explore:
    - Safeguarding and suitability to work with children
    - Previous work experience and motivation for applying for the role
    - The applicant's attitude towards children and young people
    - The applicant's ability to support the School's agenda for safeguarding and
    - Promoting the welfare of children
    - Any gaps in the applicant's employment history
    - Concerns or discrepancies arising from the information provided by the applicant and/or from a referee
    - Whether the applicant wishes to declare anything in the light of the requirement for a DBS check, e.g. their being subject to a prohibition order.
    - Travel expenses and costs incurred during the recruitment process will not normally be refunded by the Group or School.

6.9.1 Any information in regard to past disciplinary action or allegations, cautions or convictions must be disclosed and will be discussed and considered in the circumstances of the individual case during the interview process.

6.9.2 Interview panels will always consist of at least two people. The member of the panel who holds Safer Recruitment training is responsible for ensuring suitability questions are asked.

7.0 The Rehabilitation of Offenders Act 1974

7.1 The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to children. Therefore, any convictions and cautions that would normally be considered 'SPENT' must

7.2 be declared when applying for any position at the Radley Schools Group. As a result of amendments to the
Rehabilitation of Offenders Act 1974 (exceptions order 1975) in 2013 and 2020, some minor offences are now protected (filtered) and should not be disclosed.

8.0 OFFER OF APPOINTMENT

8.1 In accordance with the recommendations set out in KCSIE, the Group carries out a number of *pre-employment* checks in respect of all prospective employees.

8.2 The appointment of all new employees is subject to the satisfactory receipt of all appropriate recruitment checks including:

- Verification of identity
- Verification of the right to work in the UK
- At least two satisfactory written references
- A full employment history together with a satisfactory explanation of any gaps in employment
- Online search
- Verification of professional qualifications, where appropriate
- A satisfactory enhanced DBS check and, if appropriate, a check of the children's Barred List maintained by the DBS
- Where the successful applicant has worked or been resident overseas, such checks and confirmations as the Group may consider appropriate so that any relevant events that occurred outside the UK can be considered
- For an applicant that has taught in the EEA, a letter of professional standing from the regulating authority is required
- For an applicant to be employed in teaching work, a check that the applicant is not subject to a prohibition from teaching order issued by the Secretary of State
- Satisfactory pre-employment medical questionnaire
- Receipt of a signed Staff Suitability Declaration showing that the applicant is not disqualified from providing childcare under the Disqualification under the Childcare Act 2006 (June 2016).
- Where the successful applicant will be taking part in the management of the Group, a check under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Leadership Team and Heads of Department (including non-teaching staff). With effect from May 2018, this check also applies to staff internally promoted to management positions.

8.3 The SCR checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment practice. The checklist will be retained on personal files. The Schools themselves will confirm when all paperwork has been received and only then can a start date be agreed with the applicant. Once confirmed, the Schools will need to submit the following paperwork to the Group HR department:

- A completed Offer of Appointment Form (downloaded and completed separately as it is a shared document)
- School Offer letter

8.4 Upon receipt of the above, the Group will issue a formal Offer Letter and the Employment Agreement.

8.5 It is the responsibility of the Chair of the LAG to review the Single Central Register once each term. The Chair of the LAG will liaise with the person at the school who is responsible for the SCR on the procedure.

9.0 Proof of Identity and Right to Work in the UK

9.1 Currently, Radley Schools Group only employs a manual identity verification method; therefore, all applicants invited to attend an interview in person will be required to bring at least three identification documents as proof of address, identity and eligibility to work in the UK, in accordance with those set out in the

9.2 Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations. Only original documents or certified copies are acceptable. Where relevant, applicants must provide evidence for a change of name. Applicants must provide any additional documents required to verify their right to work

and reside in the UK.

10.0 Qualifications
10.1 All applicants must provide proof that they have obtained any qualification specified for the role or relevant to the position. Only original or certified copies of certificates are acceptable.

11.0 Employment History
11.1 All applicants will be required to provide a full employment history as part of the application process. Applicants will be required to provide a satisfactory explanation for any gaps in employment.

12.0 DBS (Disclosure and Barring Service) Certificate
12.1 All employees at the Group require an enhanced DBS Certificate and therefore a DBS Certificate must be obtained before the commencement of employment of any new employee. All staff in regulated activity will require a barred list check.

12.2 Where employees have a DBS Certificate and have previously signed up to the Update Service, consent must be given for the validity of that certificate to be checked.

12.3 In exceptional cases and only when permission is granted by the Head will a new employee be able to start without a new DBS certificate. In such cases:

- Confirmation of appointment will be subject to receipt of a satisfactory DBS Certificate
- The DBS application will be made in advance of the start date
- A satisfactory check of the barred list, all overseas checks and all relevant prohibition checks will be completed in advance of the start date
- Appropriate safeguards, such as supervision, will be put in place and recorded in a formal risk assessment and the applicant has signed to confirm their understanding of these (evidence will be retained)
- Safeguards will be reviewed every two weeks and must be approved by the Head, Head of Pre-Prep or Chief Operating Officer
- A note is added to the SCR and evidence is retained of measures put in place
- The applicant concerned will be informed of the measures in place

13.0 Portability of DBS Certificates
13.1 'Portability' refers to the re-use of a DBS Certificate obtained for a position in one organisation and for another position in another organisation. There are two portability routes:

13.2 Firstly, KCSIE allows a school to accept a pre-existing DBS certificate where the applicant moves to the school from regulated activity in another school without a gap of more than 3 months, as long as all other checks are completed satisfactorily and a separate barred list check is carried out before they start. However, while this is lawful, KCSIE discourages reliance on the 'three-month rule' and requires employers to 'carefully consider' obtaining a fresh check to ensure information is up to date.

13.3 Therefore, Radley Schools Group generally requires candidates to undergo a new DBS check and, on the rare occasion we would consider accepting a pre-existing DBS certificate, this would only be where the statutory criteria are met, and once we have also completed and received a satisfactory separate barred list check. It is the policy of the Group that we will conduct a new DBS check under Radley Schools Group as soon as is practicable.

13.4 Secondly, the DBS runs an Update Service. This is particularly useful for those who work across several schools or are otherwise likely to require another DBS check in the future. Applicants may sign up to the Update Service for a fee which is payable by the applicant and remains their responsibility. This allows employers to check quickly online whether a DBS certificate is still up to date. The original certificate must

be seen and verified to be at the right level (usually: enhanced, with barring information), and identity must also be verified.
The Group then carries out an update check with the consent of the applicant to find out whether the information on the certificate remains up to date. If the pre-existing certificate is not at the right level or the Update Service advises that the information it contains is not up to date, a new enhanced check must be carried out.

14.0 Validity of DBS Certificate
14.1 All staff are obliged to inform the School should they receive any convictions, cautions, court orders, reprimands or warnings after the date of their DBS certificate received by the Group. Failure to declare any convictions may disqualify an applicant for appointment or result in summary dismissal if the discrepancy comes to light subsequently. Radley Prep Schools will require all employees to sign a declaration on an annual basis to confirm that there have been no changes to the status of their DBS since it was issued. Disciplinary action may be taken as a result of any change or failure to inform the Group of any change.

15.0 Dealing with convictions
15.1 The Group operates a formal procedure across its schools if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- changes in circumstances,
- decriminalisation and remorse.

15.2 A formal meeting will take place face-to-face to establish the facts with the Group Head of HR. A decision will be made by the Head following this meeting. The Group reserves the right to withdraw an offer of employment in cases where the DBS disclosure response is either not presented to the School by the successful candidate, or where there is an unresolved dispute with the DBS disclosure findings following DBS confirmation of its original findings.

15.3 The Group 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. Any concerns raised during the employment checks phase will be investigated and written notes will be kept in an employment file. All documentary evidence must be original and not a photocopy.

16.0 Barred List
16.1 Before starting work, all new staff in regulated activity will be checked against the barred list, a list maintained by the Disclosure and Barring Service of individuals who are barred from working with children.

16.2 It is illegal for the Group to employ anyone who is on the list to work in regulated activity with children The definition of regulated activity includes:

- All regular work for Group with opportunity for contact with children except:
    - Work (not entailing personal care) by supervised volunteers
    - Work (not entailing care or teaching) by occasional/temporary contractors or
    - Supervised work by pupils for other pupils (excepting for those in early years)
- Personal care, or health care:
    - Personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing
    - Health care means care for children provided by or under the direction or supervision of a regulated health care professional

16.3 Within the definition of care, activity is always regulated; considerations of regularity and supervision do not apply to:

- Regular, unsupervised teaching, training, instructing, caring for or supervising children
- Regularly providing advice or guidance for children on well-being
- Driving a vehicle only for children.

17.0 Overseas Teaching Sanctions

17.1 From 1 January 2021, the Group will seek to obtain a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Information regarding this is available from the Regulated Professions database.

18.0 Additional Overseas Checks

18.1 All new employees who have lived or worked outside the UK for a continuous period of 3 months or more at any time in the last 10 years will be subject to additional checks. The Group may also make additional overseas checks on any other applicant where these checks are deemed relevant by the Group.

18.2 These checks are required to supplement the information provided by the Disclosure and Barring Service and suitable checks must be completed before the applicant begins work.

18.3 The Home Office provides guidance on the appropriate checks for each country and the Group will have regard to this guidance. Where the country is specified as unable to produce an official record, the Group will make all reasonable efforts to verify an applicant's suitability. This will include seeking additional references which cover the time spent overseas. All applicants must co-operate fully in the process to obtain these additional checks.

18.4 In exceptional cases, where the official record has been requested but not received before the applicant is due to start work, the applicant may start work only if:

- Additional satisfactory references covering the time overseas have been received in advance of the applicant starting work and
- The Head has given permission for the applicant to start work, subject to the same safeguards set out above for when a DBS Certificate has not been received.

18.5 Further details on the overseas checks available can be obtained here:
https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants

19.0 Prohibition from Teaching

19. 1The TRA maintains a database for all teachers eligible to teach in the maintained sector in England (those who have QTS). The database is referred to as the "Secure Access Portal".

19.2 All applicants who will be carrying out teaching work will be checked on the DfE Secure Prohibition list for the following:

- Those who have been prohibited from teaching
- Those who have failed to successfully complete their induction or probation period
- Those that may be the subject of a suspension or conditional order imposed by the General Teaching Council for England (prior to abolition) that is still current

19.3 A prohibition order aims to protect pupils and to maintain public confidence in the profession. 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
- Reporting on the development, progress and attainment of pupils

20.0 Prohibition from Management

20.1 All governors, Heads, staff on the senior leadership team and positions with management responsibility will be subject to a check for prohibition from management (section 128 direction). With effect from May 2018, this check also applies to staff internally promoted to management positions.

21.0 Disqualification from Childcare

21.1 The DfE Keeping Children Safe in Education requires the Group to ensure that all staff working or directly concerned in the management of any Early Years setting, including Reception and out-of-hours Group care for children up to eight years of age, are not "disqualified".

21.2 The Group requires all staff (both Prep and Pre-Prep) to sign a Disqualification from Childcare declaration.

The grounds for disqualification include:

- They have been cautioned for, convicted of, or charged with certain violent and sexual criminal offences against children and adults, at home or abroad;
- Other orders have been made against them relating to their care of children;
- They have had their registration cancelled in relation to childcare or children's homes or have been disqualified from private fostering.

21.3 If a staff member has grounds for disqualification and is disqualified, they may, in some circumstances, apply to Ofsted for a decision to waive the disqualification. For more information on disqualification, please visit the following website:
https://www.gov.uk/government/publications/applying-to-waive-disqualification-early-years-and-childcare-providers/applying-to-waive-disqualification-early-years-and-childcare-provision

22.0 Medical Fitness

22.1 The Group may ask questions at an interview stage to determine whether applicants can undertake a function which is intrinsic to the job for which they are applying.

22.2 Anyone appointed to a post involving regular contact with children must possess the appropriate level of physical and mental fitness before any appointment offer is confirmed.

22.3 All successful applicants are requested to complete a pre-employment medical questionnaire and where appropriate a doctor's medical report may be required.

22.4 We also ask staff to inform the School of any changes to their mental or physical health that may impact upon their ability to work with children or any changes to their own circumstances that the Group should be aware of.

22.5 The Group 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.

23.0 Prevent Duty

23.1 The Group has a legal duty under 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 as the Prevent duty. The Group is required to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.

For further information, visit:
https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation

24.0 VOLUNTEERS

24.1 Volunteers may require an enhanced DBS check because of the frequency of their volunteering activity and the contact they have with children.

24.2 Volunteers and parents who only accompany employees and children on one-off outings or trips that do not involve overnight stays, or who only help at specific one-off events, e.g. sports day, Group open day etc., are not required to have an enhanced DBS check.

24.3 Volunteers will always require an enhanced DBS check if they are involved in supervising children overnight.
If a volunteer is not expected to engage in regulated activity, then the School will determine whether an enhanced DBS check should be obtained by giving consideration to the following:

- The volunteer's role including the duration, frequency and nature of contact with children, and then:
- What the School knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- Whether the volunteer is well known to others in the School Community who are likely to be aware of behaviour that could give cause for concern;
- Whether the volunteer has other employment, or undertakes voluntary activities where referees who advise on suitability; and
- Any other relevant information about the volunteer or the work they are likely to do.
- Under no circumstances will a volunteer for whom an enhanced DBS check has not been obtained be left unsupervised with children. Any risk assessment decision regarding the checks made for volunteers must be appropriately recorded.

25.0 SUPPLY AGENCY STAFF
25.1 When the School uses agency or supply staff (in any position), the School must obtain confirmation in writing from the agency that all relevant checks have been completed in respect of that person. This must be received in advance of that person commencing work.

25.1 Supply agencies are required to perform the same checks as required for school staff. The School will carry out identity checks of such staff on arrival and they should therefore provide proof of identity on their first day. Agencies are required to inform the School of any information which has been disclosed on the DBS certificate obtained by the agency. The Group will require supply staff to show their original DBS certificate to the Group.

26.0 CONTRACTORS
26.1 Under no circumstances will unchecked contractors be allowed to work unsupervised within the Group. Supervision of contractors must be undertaken by a person who themselves is in regulated activity.

26.2 Where contractors are to be checked, the levels of check undertaken will be appropriate to the role and whether the work is classed as regulated activity.

26.3 Schools are responsible for ensuring the correct checks have been completed before the contractor is allowed to work unsupervised and details are recorded appropriately on the SCR.

27.0 COUNCIL MEMBERS
27.1 All Council members complete a selection process, which requires the submission of a CV and an interview with selected Trustees from the Nominations and Remuneration Committee.

27.2 Every Council member has an enhanced DBS check, barred list check and prohibition from management check. Each appointment is ratified by the Full Governing Body for a period of three years and may be subject to re-appointment.

28.0 THE CHAIR OF COUNCIL

28.1 The Chair of Council will be subject to checks by the Secretary of State for Education. It is the Group's responsibility to inform the DfE of a change to the Chair so that checks can be made in advance of the appointment as soon as practicable.

29.0 SINGLE CENTRAL RECORD OF APPOINTMENTS (SCR)

29.1 The School maintains a single central record of all recruitment and vetting checks.

29.2 The Record will contain details of vetting checks on all current members of staff at the Group and all individuals who are in regular contact with children, including supply staff, volunteers and those employed as third parties.

30.0 LEAVING EMPLOYMENT

30.1 Despite the best efforts to recruit safely, there will be occasions when allegations of abuse against children and young people are raised. In cases relating to the behaviour of an employee, the Group's and, where applicable, the Schools' Disciplinary Policy will apply.

30.2 There is a legal requirement for the Group to make a referral to the DBS where the Group believes that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

30.3 In cases of dismissal or resignation due to a person's behaviour towards children, the Group will consider a referral to DBS, TRA and the Children's Safeguarding Unit of the circumstances why the employee is leaving the Group's employment.

31.0 DOCUMENT RETENTION AND DATA PROTECTION

31.1 The Group is legally required to undertake the above pre-employment checks and to take all reasonable steps to establish an applicant's suitability to work with children. Therefore, if an applicant is successful in their application, the Group will retain on their personal file any relevant information provided as part of the application process.

31.2 This will include copies of documents used to verify identity, right to work in the UK, pre-employment medical questionnaires and qualifications and any other documentation relevant to the application.

31.3 Medical information may be used to help the Group to discharge its obligations as an employer, e.g. so that the Group may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue. Medical information is also used to establish whether an applicant is medically fit to undertake their duties in regard to caring for children.

31.4 This documentation will be retained by the Group in line with statutory and legal requirements. All information retained on employees is kept at Schools where the employee is working.

31.5 The Group HR department has electronic copies of employees' contractual paperwork. The Schools retain documents relating to the vetting of other adults (e.g. volunteers, 3rd party providers, contractors) on the same basis.

32.0 MONITORING AND EVALUATION

32.1 The Chief Operating Officer and the Head of HR will be responsible for ensuring that this policy is monitored and evaluated throughout the Group.

32.2 This will be undertaken through regular audits of the Single Central Register, appropriate training for those involved in recruitment and ensuring that the policy is reviewed and updated in line with relevant legislation.
The School Chair of the LAG will periodically check the Single Central Register and records of appointments

to ensure compliance.

APPENDIX A – SINGLE CENTRAL RECORD

The Schools are required by both The Education (Independent School Standards) Regulations 2014 and Keeping Children Safe in Education (KCSIE) to maintain a Single Central Record of pre-appointment checks (SCR).
This appendix sets out what information the SCR must contain, who must be included on it and how it must be completed to ensure compliance with regulatory requirements.

PEOPLE WHO MUST BE INCLUDED IN THE SCR
The following people must be included in the SCR:

- All staff who work at the Schools
- All supply staff who work at the Schools
- All self-employed contractors arranged by the Schools who are in regulated activity
- All volunteers where vetting checks have been made*

*KCSIE no longer requires that checked volunteers are included in the SCR. However, as a matter of good practice, Radley Prep Schools will continue to record volunteer checks in this way.

INFORMATION WHICH MUST BE RECORDED IN THE SCR
The SCR is maintained as a table of records in electronic format. Each entry contains:

- Person number
- Name
- Post
- Start date (the date the applicant started work at the Group)
- Additional checks as detailed below

The following checks are required to be recorded on the SCR:

Check	**Which date is recorded?**
Identity	Date original documents were verified
Barred list	Date check was made
Professional qualifications	Date original documents were verified
Enhanced DBS Disclosure / DBS Update check	Date original certificate was verified & disclosure number
Right to work in the UK	Date original documents were verified
Prohibition from teaching	Date check was made
Prohibition from management Additional overseas checks	Date check was made Date original documents were verified

O/S Teaching Sanction checks: Date check was made

Check	**Which date is recorded?**
References	Date original documents were verified
Employment history	Date check was made
Medical fitness	Date original document was verified

The initials of the person who carried out each check are recorded in the cover sheet within the personal file, together with a signature of the additional staff member who performed the quality assurance to confirm all checks had been made correctly.

The 'notes' column in the SCR allows for additional explanation or clarification to be added where necessary. Where the person is a member of supply staff (supplied by an agency to work under the direction of the Group), the date recorded in the SCR will be:

- The date the person's identity was verified by the Group
- The date the person's original DBS certificate was verified by the Group
- The date that written notification was received from the agency in respect of all other applicable checks

ADDING AND REMOVING ENTRIES IN THE SCR

An entry must be made in the SCR against each check before any person may start work. All columns must contain the appropriate date or information. Where a check is not required, this must be clearly indicated by 'N/A'.

In the exceptional case that a person starts work before the original DBS certificate and/or an official overseas record has been received, a risk assessment will be made (in line with the Group's Safer Recruitment Policy) and the date of the first risk assessment recorded in the SCR. An additional note will be added detailing the circumstances.

A record will be maintained in the SCR while the person continues to work or volunteer at the Group. When a person no longer works or volunteers at the Group, their record will be transferred to a record of past staff, where it will be retained in line with the Prep Schools Group Records and Retention policy.