



ST PAUL'S
GIRLS' SCHOOL

Staff Safer Recruitment & Selection Policy

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Legal framework

- Keeping Children Safe in Education 2026 (KCSIE)
- Equality Act 2010
- Education (Independent Schools Standards) (England) Regulations 2014
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020

Availability of this policy

A copy of this policy may be downloaded from our [website](#) or is available on request from the school office, St Paul's Girls' School, Brook Green, London, W6 7BS (tel: 0207 603 2288). This policy can be made available in large print or other accessible format if required.

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General

1.1 St Paul's Girls' School ("the school") is committed to ensuring the best possible environment for the students and young people in its care. Safeguarding and promoting the welfare of children and young people is its highest priority.

1.2 The school aims to recruit staff that share and understand its commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

1.3 All queries regarding the Application Form and recruitment process must be directed to the HR Department at recruiting@spgs.org.

1.4 An entry will be made on the Single Central Register for all current members of staff at the school, the proprietorial body and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.

1.5 The school is governed by the Board of Governors, with day-to-day responsibility for the management of the school being delegated to the High Mistress and the Senior Leadership Team.

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

Scope of this Policy

2.1 This Policy 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."

Senior management disqualification

3.1 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 Governors, and who carries overall responsibility for the day-to-day management and control of the charity. At St Paul's Girls' School this is the High Mistress.
- A person who is accountable only to the High Mistress or the Governors, and who is responsible for the overall management and control of the charity's finances. At St Paul's Girls' School this is the Bursar.

3.2 Being disqualified means that a person cannot take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or 'waived') the disqualification.

Agency and third-party staff

4.1 In the case of agency staff, the school will obtain written confirmation from the supply agency that the required checks have been carried out (identity, enhanced disclosure, right to work in the UK, children's barred list, prohibition, qualifications, overseas checks plus those checks set out in KCSIE as 'pre-employment' checks). In respect of the enhanced DBS check, the school will ensure that the written notification from the agency confirms that the certificate has been obtained either by them or another such business. If the check discloses any matter or information, the school will obtain a copy of the certificate before the individual starts work. The school will also confirm that the enhanced DBS certificate was issued no more than three months before the individual is due to begin work, unless the individual has worked in a school in England during those three months (the 'three-month rule') or is registered with the DBS Update Service (in which case a status check should be carried out instead).

4.2 The school will always check the identity of agency staff members on arrival.

4.3 The Single Central Record will record that these checks have been conducted and detail any necessary information in line with KCSIE.

Contractors

5.1 Where the school uses contractors to provide services, the school sets out its safeguarding requirements in the contract between the contractor (or the contractor's organisation) and will ensure that any contractor (or employee of the contractor) who is to work at the school has been subject to the necessary safer recruitment checks in accordance with KCSIE. Where an individual working at the school is self-employed, the school will either obtain the DBS check itself or request to see an existing certificate to ensure it is at the level required.

5.2 Unchecked contractors will not be allowed to work unsupervised in school. The school will determine the appropriate level of supervision depending on the circumstances.

5.3 The school will always check the identity of contractors on arrival.

5.4 The Single Central Record will record that these checks have been conducted and detail any necessary information in line with KCSIE.

Governors

6.1 The Chair and members of the school's governing body will be subject to checks including enhanced DBS with barred list check, overseas convictions check, where relevant, identity and right to work checks conducted by HR. The school will also seek confirmation that governors are not prohibited from leadership and management.

6.2 In addition, a check is made of the Charity Commission register of removed trustees, the Companies House register of disqualified directors and the Insolvency Register, together with online checks, by the Secretary to governors.

6.3 Governors are also required to complete an HMRC fit and proper person declaration required under the Finance Act 2010 and a self-declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria in the Charities Act 2011 (see para 9.26) and a trustee eligibility declaration. They are also required to read and sign the Code of Conduct.

6.4 When appointing a new Chair of Governors, the incoming chair must undergo checks via the DfE, including an enhanced DBS check counter-signed by the Secretary of State. It is the responsibility of the school to inform the DfE of a change of chair so that the checks can be made in advance of appointment or as soon as practicable after appointment.

Volunteers

7.1 Volunteers at the school bring a range of skills and experience that can enhance the learning opportunities of students. Volunteers who work regularly with children will be subject to appropriate safeguarding checks in accordance with KCSIE. The school will undertake risk assessments and determine the level of supervision required. Volunteers who are undertaking a regulated activity will be subject to an enhanced DBS check with children's barred list information. They will also be required to provide evidence of their entitlement to work in the UK, and in most cases they will be required to provide references, especially where they are working closely with students.

7.2 The Single Central Record will record that these checks have been conducted and detail any necessary information in line with KCSIE.

Application Form

8.1 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.

8.2 The school will make candidates aware that all posts in the school involve some degree of responsibility for safeguarding children. Candidates for employed posts will receive a Job Description, which will include essential and desirable skills required for the role applied for which will explicitly state safeguarding responsibilities and child welfare commitments.

8.3 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.

8.4 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 Children's 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 there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration.

8.5 The school takes its responsibility to safeguard children very seriously and informs any successful candidate who is aware of anything that may affect their suitability to work with children that they must notify the HR Department immediately. Through the Safeguarding (Child Protection) policy and the Reporting Low Level Concerns policy, staff are aware that they must report concerns via CPOMS StaffSafe. This will include notification of any arrests, charges, convictions, cautions, court orders, reprimands or warnings they may receive.

8.6 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.

8.7 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.

8.8 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

9.1 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.

9.2 The school will carry out a search (which may include but is not limited to a search via an online search engine and may also extend to social media and other publicly accessible online sources) 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.

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

9.4 Shortlisted candidates will 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.

9.5 The school will, where possible, 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.

9.6 All formal interviews will have a panel of at least two people chaired by a designated senior member of staff. At least one person on the appointment panel will have undertaken safer recruitment training. 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.

9.7 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.

9.8 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.

9.9 The school asks 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.

9.10 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

10.1 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 students

- Delivering and preparing lessons to students
 - Assessing the development, progress and attainment of students
 - Reporting on the development, progress and attainment of students
- Verification of professional qualifications, including Qualified Teacher Status (QTS), where appropriate
 - Verification of successful completion of a statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999)
 - Overseas criminal record checks will be requested for applicants and governors with periods of overseas residence exceeding three months in the last five years. Overseas checks will be made in accordance with the guidance provided for each country by the Home Office. Applications for overseas checks must be made before somebody starts work. Where a check is not received before the start date, the applicant will be required to delay starting work; however, if the required criminal and barring checks have been successfully undertaken, the school may seek alternative methods to check suitability and may complete a risk assessment in advance of the start date. Alternative methods of checking suitability will usually entail taking an additional reference beyond the two normally expected. The risk assessment determining whether the person can start work unsupervised will be approved by the High Mistress or Bursar
 - Evidence of satisfactory medical fitness
 - 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
 - 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.

10.2 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 Privacy Notice for Staff and the Staff Data Protection Policy. This information will be reviewed against the Job Description for the 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.

10.3 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

11.1 The school will seek the references referred to in section 7 above for shortlisted candidates (including internal applicants) and will approach previous employers for information to verify particular experience or qualifications, wherever possible before interview. One of the references must be from the applicant's current or most recent employer. 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.

11.2 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 been found to be false, unfounded, unsubstantiated, or malicious should not be included in any reference.

11.3 The school will only accept references obtained directly from the referee and will not rely on references or testimonials provided by the applicant or 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.

11.4 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.

11.5 If the candidate is not currently working with children, the school will secure a reference from a relevant employer in relation to employment in which the candidate worked with children. If the candidate has never worked with children, the school will obtain a reference from the candidate's current employer, training provider or education setting.

Criminal Records Policy

12.1 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.

12.2 The school will comply 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>.

DBS Update Service

13.1 Where an applicant subscribes to the DBS Update Service, the applicant must give the school consent 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

14.1 Where a DBS disclosure is delayed, the High Mistress may allow a member of staff to commence work:

- Without confirming the appointment
- After a satisfactory check of the barred list 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, the individual being subject to appropriate supervision)
 - Safeguards reviewed at least every two weeks by the High Mistress or Bursar and their Line Manager
 - The person in question is informed what these safeguards are
 - A note is added to the single central record and evidence kept of the measures put in place.

Retention, Security of Records and Data Protection Obligations

15.1 The school will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and the obligations under Staff Data Protection Policy. Copies of DBS certificates will not be retained.

15.2 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 Privacy Notice for Staff and the Staff Data Protection Policy.

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 them 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 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
- The school is provided with false information in, or in support of, an applicant's application
- 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
- 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 the school's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving.