



Coleg Llanymddyfri
Llandovery College

Safer Recruitment Policy

May 2021

Introduction

Llandovery College is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The College is also committed to providing a supportive and flexible working environment to all its members of staff. The College recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff (including volunteers) of the highest calibre, who share this commitment.

This policy is rooted in the College's responsibility to keep children safe, and in its principles of fairness and non-discrimination and is designed to achieve the best match between an individual and the requirements of the vacant position in order for the College to be successful through its staff.

This policy follows the guidelines for safeguarding children and safer recruitment for children identified by the Welsh Government's Keeping Learners Safe (2021), the National Minimum Standards (Wales) (NMS), the Disclosure and Barring Service (DBS), and is linked to the College's Child Protection/Safeguarding policy, which can be found on the College's website and in the Staff Handbook.

The aims of the College's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position
- to ensure that all job applicants are considered equally and consistently
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Welsh Government), *Keeping Learners Safe* (2021), *Disqualification under the Childcare Act 2006 (DUCA)*, the Revised Prevent Duty Guidance for England and Wales, April 2021 (the **Prevent Duty Guidance**) and any guidance or code of practice published by the Disclosure and Barring Service (**DBS**); and
- to ensure that the College meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

The College will not unlawfully discriminate on the grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, trade union membership, part-time or fixed-term status and any criminal cautions or convictions.

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

1. Data protection

The College is legally required to carry out the pre-employment checks detailed in this procedure. Staff, and prospective staff, will be required to provide certain information to the College, to enable the carrying out of checks that are applicable to their role. The College will also be required to provide certain information to third parties, such as the Disclosure and Barring Service (DBS), and the Teaching Regulation Agency/Education Workforce Council (EWC). Failure to provide requested information may result in the College not being able to meet its employment, safeguarding or legal obligations. The College will process personal information in accordance with the Staff Privacy Notice.

2. The Recruitment and Selection Procedure

Llandovery College regularly reviews its recruitment procedure to ensure the safety of pupils in education by preventing, as far as possible, unsuitable people from working at the College. There are two separate recruitment procedures for the appointment of teaching and non-teaching staff. Both procedures embrace common elements to ensure compliance and equality. Procedures are also compliant with relevant legislation including the statutory guidance published by the Welsh Government's Keeping Learners Safe, the National Minimum Standards for Boarding Schools – Wales (NMS) and the Code of Practice published by the DBS.

The Warden and senior staff identify staffing recruitment needs. A job description is then prepared which is supplemented by other departmental and College information. The selection criteria for the role will be based on the requirements identified through the job description and the qualities and experience that the applicant(s) bring to the role. It is these selection criteria that form the basis of fair selection.

Vacancies will be advertised, internally and/or externally, using the best methods, as deemed appropriate, to attract and recruit the best applicant available for the position.

The job description and other information is sent to applicants, together with an application form, the College's Child Protection/Safeguarding Policy, Recruitment Policy and Procedures and the DBS Code of Practice.

All applicants will be required to complete an application form containing questions about their academic and employment history, their right to work in the UK, and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed.

Full explanation of any gaps in employment must be provided by the applicant. A curriculum vitae will be accepted in addition to, but not in place of, the completed application form.

A list of applicants is prepared against the selection criteria and interviews arranged. Shortlisted

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

Before confirmation of appointment, two references will be obtained, at least one of which must relate directly to working with children.

Applicants called for interview will be expected to bring proof of identification e.g. passport or birth certificate and proof of qualifications.

A panel appropriate to the role will be involved in the recruitment, interview and selection process to provide reassurance, fairness, balance, objectivity and safety. At least one member of the panel will have completed the safer recruitment training.

Interviews will be conducted in a fair and consistent manner. A written record of the interview will be kept, and signed by the interviewer, documenting reasons for any gaps in the employment history and periods of employment outside of the United Kingdom, along with an assessment by the interviewers.

Once all interviews have been completed the applicants will again be reviewed against the selection criteria and a decision made.

If it is decided that an offer of employment will be made, following a formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the College's standard terms and conditions of employment;
- verification of the applicant's identity (where that has not previously been verified); the receipt of two references (one of which must be from the applicant's most recent employer) which the College considers to be satisfactory;
- for positions which involve "teaching work", information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by, the Teaching Regulation Agency (**TRA**) or the Education Workforce Council (**EWC**) which renders them unable or unsuitable to work at the College;
- for applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by, a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at the College; where the position amounts to "regulated activity", the receipt of an enhanced disclosure from the DBS which the College considers to be satisfactory;
- where the position amounts to "regulated activity" confirmation that the applicant is not named on the Children's Barred List*;
- information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at the College;
- for management positions, information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008, which renders them unable or unsuitable to work at the College;

- confirmation that the applicant is not disqualified from working in connection with early or later years provision (if applicable, see section 5 below);
 - verification of the applicant's medical fitness for the role;
 - verification of the applicant's right to work in the UK;
 - any further checks which the College decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references; and
 - verification of professional qualifications which the College deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).
- ***The College is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The College is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, the College can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.**
 - **Whether a position amounts to "regulated activity" must therefore be considered by the College in order to decide which checks are appropriate. It is however likely that in nearly all cases the College will be able to carry out an enhanced DBS check and a Children's Barred List check.**

3. Medical Fitness

The College is legally required to verify the medical fitness of anyone to be appointed to a post at the College, **after** an offer of employment has been made but **before** the appointment can be confirmed. It is the College's practice that all applicants to whom an offer of employment is made must complete a Health Questionnaire. If the College feels that it is necessary, it will arrange for the information contained in the Health Questionnaire to be reviewed by the College's medical advisor. 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 timetable, extra-curricular activities, layout of the College etc. If the College's medical advisor has any doubts about an applicant's fitness the College will consider reasonable adjustments in consultation with the applicant. The College may also seek a further medical opinion from a specialist or request that the applicant undertakes a full medical assessment.

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

4. Pre-employment checks

In accordance with the recommendations set out in Keeping Learners Safe, DUCA and the requirements of The Education (Independent College Standards) Regulations 2014 and the *Boarding Colleges*:

national minimum standards the College carries out a number of pre-employment checks in respect of all prospective employees.

In addition to the checks set out below, the College reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the College. This may include internet and social media searches.

4.1 Verification of identity, address and the right to work in the UK

All candidates invited to interview will be required to bring with them evidence of identity, their right to work in the UK, address and qualifications, as set out in the list of valid identity documents (Appendix 1). These requirements comply with DBS identity checking guidelines.

Where an applicant has changed name by deed poll or any other means then he/she will be required to provide documentary evidence of the change. The College also asks for the date of birth of all applicants (and proof of this) to assist in the verification of identity. The College does not discriminate on the grounds of age.

4.2. References

References will be taken up on short listed candidates prior to confirmation of appointment. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the College. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. All referees will be sent a copy of the job description and person specification for the role for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title / duties, reason for leaving, performance, sickness* and disciplinary record;
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be false, unsubstantiated or malicious; and

- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people, except where the allegation or concerns were found to be false, unsubstantiated or malicious;

(*questions about health or sickness records will only be included in reference requests sent out after the offer of employment has been made.)

The College 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 College will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

The College may at its discretion make telephone contact with any referee to verify the details of the written reference provided.

4.2 Criminal Records Check

The College applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the College which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of the College will amount to "regulated activity" if it is carried out:

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

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

It is for the College to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances. However, nearly all posts at the College amount to regulated activity. Limited exceptions could include an administrative post undertaken on a temporary basis in the College office outside of term time or voluntary posts which are supervised.

The DBS now issues a DBS disclosure certificate to the subject of the check only, rather than to the College. It is a condition of employment with the College that the **original** disclosure certificate is provided to the College upon receipt. Original certificates should not be sent by post. A convenient time and date for doing so should be arranged as soon as the certificate has been received. Employment will remain conditional upon the original certificate being provided and it being

considered satisfactory by the College.

If there is a delay in receiving a DBS disclosure, the Warden has discretion to allow an individual to begin work pending receipt of the disclosure certificate. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once appropriate supervision has been put in place. A risk assessment will be put in place and arrangements will be reviewed every two weeks until the DBS arrives.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants may also be asked to provide further information, including a criminal records check from the relevant jurisdiction(s), a certificate of good conduct and/or references from any employment held. Work can only commence once the overseas information has been received and only if the College has considered that information and confirmed that the applicant is suitable to commence work at the College.

4.4 Prohibition from Teaching Check

The College is required to check whether staff who carry out "teaching work" are prohibited from doing so. The College uses the TRA/EWC Teacher Services system to check whether successful applicants are the subject of a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the TRA/EWC.

In addition the College asks all applicants for roles which involve "teaching work" (and their referees) to declare in the application form whether they have ever been referred to, or are the subject of a sanction, restriction or prohibition issued by, the TRA or the EWC.

It is the College's position that this information must be provided in order to fully assess the suitability of an applicant for a role which involves "teaching work". Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the TRA/EWC (or other equivalent body) whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, the College will consider whether the facts of the case render the applicant unsuitable to work at the College.

The College carries out this check, and requires associated information, for roles which involve "teaching work". In doing so the College applies the definition of "teaching work" set out in the Teachers' Disciplinary (England) Regulations 2012 which states that the following activities amount to "teaching work":

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

The above activities do not amount to "teaching work" if they are supervised by a qualified teacher or other person nominated by the Warden. If in any doubt or if the applicant has taught previously, or may teach in future, the check will be undertaken, including for sports coaches.

In addition, for all appointments made on or after 18 January 2016, where an applicant has carried out

teaching work outside of the UK the College will ask the applicant (and their referees) whether they have ever been referred to, or are the subject of a sanction issued by, a regulator of the teaching profession in the countries in which they have carried out teaching work. This will include checking for the existence of any sanctions issued by regulators of the teaching profession in other EEA countries using the TRA/EWC systems.

4.5 Prohibition from Management Check

The College is required to check whether any applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent College (a **section 128 direction**).

This check applies to appointments to the following positions made on or after 12 August 2015:

- Head/Warden;
- teaching posts on the senior leadership team;
- teaching posts which carry a departmental head role; and
- support staff posts on the senior leadership team.

It also applies to appointments to the governing body.

The relevant information is contained in the enhanced DBS disclosure certificate (which the College obtains for all posts at the College that amount to regulated activity). It can also be obtained through the TRA/EWC systems. The College will use either, or both, methods to obtain this information.

In addition the College asks all applicants for management roles to declare in the application form whether they have ever been the subject of a referral to the Department for Education, or are subject to a section 128 direction or any other sanction which prohibits, disqualifies or restricts them from being involved in the management of an independent College.

It is the College's position that in order to fully assess the suitability of an applicant for a management role it must be provided with the above information. Where an applicant is not currently prohibited from management but has been the subject of a referral to, or hearing before, TRA/EWC or other appropriate body whether that resulted in the imposition of a section 128 direction or other sanction, or where a section 128 direction or other sanction has lapsed or been lifted, the College will consider whether the facts of the case render the applicant unsuitable to work at the College.

4.6 Disqualification from acting as a charity trustee or senior manager

4.6.1 Background

Under the Charities Act 2011 it is a criminal offence for a person to act as a trustee or senior manager of a charity when disqualified from doing so. The Charities Act 2011 sets out the grounds on which a person can be disqualified from acting as a trustee or senior manager. These include various spent and unspent criminal offences and other sanctions.

4.6.2 Who is covered?

A person is considered to be a charity trustee if they are one of the people who have general control and management of the administration of the charity. In an independent College the trustees will typically be the governors of the College. Senior managers include those employees who report directly to the charity trustees or have responsibility for the overall management and control of the charity's finances. At the College the disqualification rules will be applicable to all governors, the Warden, Finance Director, and potentially other senior staff who report directly to the governors.

4.6.3 Self-declaration

All those who are covered by the disqualification rules are required to complete a self-declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria. A failure to disclose relevant information, or the provision of false information, which subsequently comes to the College's attention may result in the termination of an appointment as a governor or senior manager or the withdrawal of an offer of employment and may also amount to a criminal offence. All those who are required to complete a self-declaration form are also under an ongoing duty to inform the College if there is a change in their circumstances that results or may result in them becoming disqualified from acting as a governor or senior manager.

4.6.4 Checks by the College

To ensure that it has accurate and up to date information the College will also check the following registers in respect of each governor and senior manager who is already in post or is appointed in future:

- a) the Insolvency Register
- b) the register of disqualified directors maintained by Companies House; and
- c) the register of persons who have been removed as a charity trustee.

4.6.5 Waiver

A person who discloses that one or more of the disqualification criteria is applicable to them may apply to the Charity Commission for a waiver of the disqualification. The School may at its absolute discretion withdraw an offer of employment for a senior manager or cease or terminate an appointment to the governing body if a waiver application becomes necessary or is rejected by the Charity Commission. The School is under no obligation to await the outcome of a Charity Commission waiver application before taking such action.

5. Contractors and agency staff

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

Agencies who supply staff to the College must also complete the pre-employment checks which the College would otherwise complete for its staff. Again, the College requires confirmation that these checks have been completed before an individual can commence work at the College.

The College will independently verify the identity of staff supplied by contractors or an agency in accordance with section 4.1 above and will require the provision of the original DBS disclosure certificate before contractor or agency staff can commence work at the College.

This will not usually apply to delivery and emergency maintenance personnel who are supervised.

6. Volunteers

The College will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of the College.

The College will request an enhanced DBS disclosure without Children's Barred List information on all volunteers who do not undertake regulated activity. This is likely to be because their volunteering duties are subject to regular, day to day supervision by a fully checked member of staff or by a volunteer who the College has deemed appropriate to supervise and ensure the safety of those pupils in their care.

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

It is the College's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the College for three consecutive months or more. Those volunteers who are likely to be involved in activities with the College on a regular basis may be required to sign up to the DBS update service as this permits the College to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

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

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

7. Visiting Speakers and The Prevent Duty

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

The College is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the College or perform any other regular duties for or on behalf of the College.

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

The College will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the College. In doing so the College will always have regard to the Visitors Policy, the Prevent Duty Guidance and the definition of "extremism" set out in the Revised Prevent Duty Guidance: for England and Wales (2021) which states:

“ 'Extremism' is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.”

In fulfilling its Prevent Duty obligations the College does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

The College reserves the right to obtain such information on any other person appointed to work for or at the College.

8. Recruitment of Ex-offenders

The College will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. The College makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the College. Each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All positions within the College are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules (see section 4.3 above).

A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for the College to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the College. The College will make a report to the Police and / or the DBS if:

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

8.1 Assessment criteria

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 College will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- 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; and
- the circumstances surrounding the offence and the explanation(s) offered by the applicant.

If the post involves regular contact with children, it is the College'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; or
- 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 College'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 College's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

8.2 Assessment procedure

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 College will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Warden before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the College may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

9. Retention and security of disclosure information

The College's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

In particular, the College 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 College's senior management team and HR Department staff;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months. The College 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;
- 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.

10. Appointment of Staff

All offers of employment are subject to the satisfactory receipt and completion of all pre-employment checks

All recruitment processes and documentation within the College are held by the Bursary.

All paperwork relating to identity, qualifications, DBS Disclosures, for unsuccessful applicants will be shredded and disposed of securely, immediately after the successful applicant has been formally confirmed. All other recruitment paperwork relating to unsuccessful applicants will be stored for a period of six months and then shredded and disposed of securely.

The successful applicant will be issued with an offer letter, terms and conditions of employment, Health and Safety Policy, pension information and the College Information Guide. Support staff will also be issued with the policy and procedures relating to child protection and receive training in the first six months of their appointment. Teaching staff will receive the policy and procedures relating to child protection on commencement of their role during their induction process.

11. Retention of records

The College is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the College will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify right to work in the UK, medical fitness and qualifications. Medical information may be used to help the College to discharge its obligations as an employer e.g. so that the College may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by the College for the duration of the successful applicant's employment with the College and in accordance with the College's Retention of Records Policy after employment terminates.

If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.

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

12. Whistleblowing and Exit Interviews

All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the College's policies (including the Whistleblowing Policy, the Safeguarding Policy and the Staff Code of Conduct). Safeguarding children is at the centre of the College's culture and is accordingly considered formally during staff performance development reviews and appraisal and finally at an exit interview which are held with all leavers.

13. Referrals to the DBS and the Teacher Regulation Agency/Education Workforce Council

This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks the College also has a legal duty to make a referral to the DBS in circumstances where an individual:-

- has applied for a position at the College despite being barred from working with children; or
- has been removed by the College from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

If the individual referred to the DBS is a teacher, the College may also decide to make a referral to the TRA and the EWC.

Only original documents (not copies) will be accepted.

Group 1: Primary identity documents

Documents	Notes
Passport	Any current and valid passport
Biometric residence permit	UK
Current driving licence – photocard	UK, Isle of Man, Channel Islands and EU (full or provisional)
Birth certificate - issued at time of birth (within 42 days of date of birth)	UK and Channel Islands – including those issued by UK authorities overseas, e.g. embassies, High Commissions and HM Forces
Adoption certificate	UK and Channel Islands

Group 2a: Trusted government documents

Documents	Notes
Current driving licence – photocard	All countries (full or provisional)
Current driving licence – paper version	UK, Isle of Man, Channel Islands and EU (full or provisional)
Birth certificate – issued after time of birth	UK and Channel Islands
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

Document	Notes	Issue date and validity
Mortgage statement	UK or EEA	Issued in last 12 months
Bank or building society statement	UK and Channel Islands or EEA	Issued in last 3 months
Bank or building society account opening confirmation letter	UK	Issued in last 3 months
Credit card statement	UK or EEA	Issued in last 3 months
Financial statement, e.g. pension or endowment	UK	Issued in last 12 months
P45 or P60 statement	UK and Channel Islands	Issued in last 12 months
Council Tax statement	UK and Channel Islands	Issued in last 12 months
Work permit or visa	UK	Valid up to expiry date

Letter of sponsorship from future employment provider	Non-UK or non-EEA only - valid only for applicants residing outside of the UK at time of application	Must still be valid
Utility bill	UK – not mobile telephone bill	Issued in last 3 months
Benefit statement, e.g. Child Benefit, Pension	UK	Issued in last 3 months
Central or local government, government agency, or local council document giving entitlement, e.g. from the Department for Work and Pensions, the Employment Service, HMRC	UK and Channel Islands	Issued in last 3 months
EU National ID card		Must still be valid
Cards carrying the PASS accreditation logo	UK and Channel Islands	Must still be valid
Letter from head teacher or college principal	UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be provided	Must still be valid