Radnor House
SEVENOAKS
celebrating every individual

Safer Recruitment Policy

Applies to:

- All staff (teaching and non-teaching), the directors and volunteers working in the School.
- Contractors

Availability:

This policy is made available in the following ways:

- The School's website www.radnor-sevenoaks.org;
- Via Teams, All Staff Shared Documents, Compliance, Policies;
- On request a copy may be obtained from the School's Office.

Monitoring and Review:

- This policy will be subject to continuous monitoring, refinement and audit by the Head.
- The Board of Directors undertake a formal annual review of this policy.

Signed:

David Paton
Head

Ian Davies
Chairman of the Board of Directors

Reviewed: September 2026
Next Review: September 2027

1. Introduction

1.1. Radnor House Sevenoaks ("the School") is committed to ensuring the best possible environment for the pupils in its care. Safeguarding and promoting the welfare of pupils is our highest priority.

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

2. The School aims to:

2.1. Ensure that thorough recruitment procedures and pre-employment vetting for appointing all staff, including volunteers and contractors, enables the School to deter, identify and reject any person deemed unsuitable to work or come into contact with our pupils; and,

2.2. Operate such procedures consistently and thoroughly while obtaining, collating, analysing, and evaluating information from and about applicants, as well as those potentially working with children.

2.3. It therefore seeks to ensure compliance with all current relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping children safe in education (KCSIE) 2026, Disqualification under the Childcare Act 2006 (DUCA), the Prevent Duty Guidance for England and Wales (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS).

3. Employment and Safer Recruitment

3.1. All members of the teaching and support staff at the School, including part-time staff, temporary and supply staff, contractors, volunteers and visiting staff, such as peripatetic musicians and sports coaches, are checked in accordance with the full requirements of the Disclosure and Barring Service (DBS) and the centralised record (Single Central Register) before starting work.

3.2. The current required checks include identity, right to work in the UK, qualifications, medical fitness, employment history, enhanced DBS (including barred check), separate barred list check as appropriate, disqualification from childcare, prohibition from teaching and management as appropriate, overseas police as appropriate, references and a basic online search.

3.3. The chairperson of the interview panel must have completed, and remain up to date with the requirements of, safer recruitment training and assessment. HR will nominate a chairperson for each set of interviews.

4. Advertisements

4.1. All vacancies will be advertised on the School's website, job boards and recruitment agencies as appropriate.

4.2. All advertising regarding employment will carry the following wording:

4.2.1. *The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Applicants will be required to undergo child protection screening appropriate to the post, including checks with past employers and the Disclosure and Barring Service (DBS) for an Enhanced Disclosure.*

4.3. Safeguarding checks will be undertaken.

4.4. The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children, will be included in the advertisement.

4.5. Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013, and 2020. If the role is exempt, certain spent convictions and cautions are 'protected'. This means they do not need to be disclosed, and if they are disclosed, they cannot be taken into account.

4.6. All job advertisements and job application packs will include the following:

4.6.1. Safeguarding Policy.

4.6.2. Staff Code of Conduct.

4.6.3. Safer Recruitment Policy.

4.6.4. Application Form.

4.6.5. Job Applicant Data Privacy Notice.

4.6.6. Job Description.

5. Application forms

5.1. All applicants are required to complete an Application Form containing questions about their academic and employment history, this must be the full history and suitability for the role. A curriculum vitae will not be accepted in place of a completed application form; however, it may be submitted in addition to it.

5.2. Our application forms will:

5.2.1. Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity).

5.2.2. All internal applicants for externally advertised posts will need to follow the same process as that followed by external applicants, including the submission of complete application forms. For posts that are exclusively internally advertised a cover letter and CV will be required.

5.2.3. Our application form also requests more detailed information regarding teaching experience, special areas of teaching interest, and any relevant training undertaken recently (e.g. First Aid course).

6. Shortlisting

6.1. 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.

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

7. References

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

7.2. When seeking references the School will:

7.2.1. Not accept open references.

7.2.2. Liaise directly with referees and verify any information contained within references with the referees.

7.2.3. Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school-based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.

7.2.4. Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.

7.2.5. Secure a reference from the relevant employer from the last time the candidate worked with children, if they are not currently working with children.

7.2.6. Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.

7.2.7. Resolve any concerns before any appointment is confirmed.

8. Interviews

8.1. All formal interviews will have a panel of at least two people chaired by the Head or another designated senior member of staff. It is recommended best practice that at least one person on the appointment panel will have undertaken safer recruitment training.

8.2. 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.

8.3. 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.

8.4. We request that all candidates invited to interview also bring with them:

8.4.1. A birth certificate and other photographic identification.

8.4.2. A utility bill or financial statement issued within the last three months showing the candidate's current name and address.

8.4.3. Where appropriate, any documentation evidencing a change of name.

8.4.4. Where applicable, proof of entitlement to work and reside in the UK. Originals of the above are necessary.

8.4.5. Qualified teacher status or qualifications appropriate for the position.

8.4.6. The School only accepts originals of the above are necessary. Photocopies or certified copies are not sufficient.

8.5. Candidates with a disability who are invited to interview should inform us of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

8.6. At the interview, candidates will be asked to sign the declaration on the application form where there is an electronic signature.

8.7. The panel will assess the candidate's attitude towards children and young people and their ability to support the safeguarding policies as well as the aims of the School.

8.8. Questions relating to child protection and safeguarding children will be asked in every interview for staff and volunteers prior to an offer of appointment.

8.9. We will not ask questions regarding health at the interview. A successful candidate is then required to complete a self-declaration medical health questionnaire.

8.10. Interview notes will be made and copies retained on the relevant personnel files.

8.11. Lesson Observations for teaching positions, where possible, the candidate will be observed teaching a lesson and notes kept of the outcome of the observation.

9. Pre-Appointment Vetting Checks

9.1. Any offer to a successful candidate will be conditional upon:

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

9.1.2. Verification of identity and qualifications, including, where appropriate, evidence of the right to work in the UK (if not already received);

9.1.3. The School will request a new DBS for all new candidates; a previous DBS will not be accepted;

9.1.4. A satisfactory enhanced DBS check and, if appropriate, a check of the Children's Barred List maintained by the DBS;

9.1.5. 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;

9.1.6. Verification of professional qualifications, including Qualified Teacher Status (QTS), where appropriate;

9.1.7. Verification of successful completion of a statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999);

9.1.8. Where the successful candidate has worked or been resident overseas: Such further checks and confirmations as we may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing us with a letter from the professional regulating authority in the country (or countries) in which they have worked confirming that they have not imposed any sanctions or restrictions, and/or that they are aware of any reason why they may be unsuitable to teach;

9.1.9. Confirmation that the candidate is not disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006" or Receipt of a signed Self-

Declaration form showing that the candidate is not disqualified from providing childcare as set out in the statutory guidance "Disqualification under the Childcare Act 2006;

9.1.10. Where the successful candidate will be taking part in the management of the School, a check will be carried out under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Management Team and teaching heads of department; and

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

9.3. 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.

9.4. The School will record all information on the checks carried out in the School's Single Central Record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files.

10. DBS Update Service

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

11. If Disclosure is delayed

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

11.1.1. Without confirming the appointment;

11.1.2. After a satisfactory check of the barred list, if the person will be engaging in regulated activity and all other relevant checks (including any appropriate prohibition checks) have been completed satisfactorily;

11.1.3. Provided that the DBS application has been made in advance;

11.1.4. With appropriate safeguards taken (for example, supervision);

11.1.5. Safeguards reviewed at least every two weeks by the Head and a member of staff;

11.1.6. The person in question is informed of what these safeguards are, and

11.1.7. It is recommended, but is not a requirement, that a note is added to SCR and evidence kept of the measures put in place.

11.1.8. A risk assessment would be undertaken by the Head.

12. Regulated Activity Definition

12.1. Regulated activity relating to children is defined in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012. It refers to work that a barred person must not undertake. Within a school setting, regulated activity includes:

12.1.1. Teaching, training, instructing, caring for or supervising children

12.1.2. Providing advice or guidance on the physical, emotional or educational wellbeing of children

12.1.3. Driving a vehicle solely for children

12.1.4. Engaging in intimate or personal care, or providing healthcare

12.2. A person will be deemed to be engaging in regulated activity where such activity:

12.2.1. Is carried out frequently (once a week or more),

12.2.2. Is carried out on four or more days within a 30-day period, or

12.2.3. Is carried out overnight

12.3. In addition, regulated activity includes work carried out in a school or other specified place which provides the opportunity for contact with children and is carried out regularly.

13. Agency and third-party staff

13.1. In the case of agency or contract workers, we set out our safeguarding requirements in the contract between the organisation and the School and must obtain written confirmation from the agency or company that it has carried out the same checks as we would otherwise perform on any individual working at the school or college (or who will be providing education on the School's behalf, including through online delivery). We conduct identity checks on agency and contract workers upon arrival at school, and in the case of agency workers (which includes supply staff), we require a copy of the relevant DBS check.

13.2. We will verify with the relevant supply agency that the required checks have been completed, including identity, enhanced disclosure (renewed every 3 years), right to work in the UK, barred list, prohibition, qualifications, overseas checks, and those checks outlined in KCSIE as 'pre-employment' checks. The Single Central Record indicates that these checks have been completed, and we conduct our own identity verification, reviewing a copy of the disclosure (whether or not it discloses any information).

14. Contractors

14.1. The School will ensure that any contractor, or any employee of the contractor, who is to work at the School has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

14.1.1. An enhanced DBS check with barred list information for contractors engaging in regulated activity.

14.1.2. An enhanced DBS check, not including barred list information, for all other contractors who are not in a regulated activity but whose work provides them with an opportunity for regular contact with children.

14.1.3. Obtain the DBS check for self-employed contractors.

14.1.4. The School does not keep copies of a DBS.

14.2. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

14.3. 3. the School will verify the identity of all contractors and their staff upon arrival. l.

14.4. For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

15. Volunteers

15.1. The School will ensure that all volunteers are subject to appropriate safer recruitment and safeguarding checks before they begin volunteering, taking into account the nature of the role, the frequency of the activity, and whether the role involves regulated activity with children.

15.2. From 1 September 2026, the Crime and Policing Act 2026 removes the supervision exemption from the definition of regulated activity. This means that volunteers who teach, train, instruct, care for, or supervise children will be treated as engaging in regulated activity where the activity is carried out frequently, on more than three days in a 30-day period, or overnight, regardless of whether the volunteer is supervised by a member of staff.

15.3. When assessing whether the regulated activity threshold is met, the School will consider the total amount of relevant volunteering undertaken by the individual, including volunteering carried out elsewhere as well as within the School. Where the combined activity amounts to more than three days in a 30-day period, or otherwise meets the frequency or overnight criteria, the individual will be treated as engaging in regulated activity.

15.4. The School will not permit any volunteer to engage in regulated activity unless the appropriate checks have been completed. This will include an enhanced DBS check with children's barred list information for all volunteers who are new to regulated activity.

15.5. For volunteers who are not engaging in regulated activity, the School will carry out a written risk assessment to determine whether an enhanced DBS check without children's barred list information is appropriate. The School will retain a record of this assessment and the decision reached.

15.6. The School will ensure that appropriate checks are carried out to confirm, where relevant, that volunteers are not disqualified under the Childcare Act 2006 and the Childcare Disqualification Regulations 2018. Where the School decides that a volunteer falls outside the scope of these requirements, it will retain a record of its assessment, including any risks identified, control measures put in place, and any advice sought.

15.7. Supervision may still be used as a safeguarding control measure where appropriate, but it will not be relied upon as a basis for excluding a volunteer from regulated activity where the statutory definition is otherwise met.

16. Governors

16.1. All governors will have an enhanced DBS check with barred list information if working in regulated activity.

16.2. All proprietors, trustees, local governors and members will also have the following checks:

16.2.1. A section 128 check (to check the prohibition on participation in management under section 128 of the Education and Skills Act 2008).

16.2.2. Identity.

16.2.3. Right to work in the UK.

16.2.4. Other checks deemed necessary if they have lived or worked outside the UK.

17. Policy on the recruitment of ex-offenders

17.1. The School will not unfairly discriminate against any applicant for employment on the basis of conviction or other details revealed. The School makes appointment decisions on the basis of merit and ability.

17.2. If an applicant 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.

17.3. All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must declare all previous criminal convictions and/or cautions or bind-overs, including those prior to 18 years of age, or which would normally be considered "spent" except for those to which the DBS filtering rules apply. The candidate is not required to disclose convictions or cautions that are 'protected', as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020). A failure to disclose a previous conviction (which should be declared, including those spent, or in childhood) 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.

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

17.4.1. It receives an application from a barred person;

17.4.2. It is provided with false information in, or in support of, an applicant's application; or

17.4.3. It has serious concerns about an applicant's suitability to work with children.

17.5. 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:

17.5.1. Whether the conviction or other matter revealed is relevant to the position in question;

17.5.2. The seriousness of any offence or other matter revealed;
17.5.3. The length of time since the offence or other matter occurred;
17.5.4. Whether the applicant has a pattern of offending behaviour or other relevant matters;
17.5.5. Whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
17.5.6. The circumstances surrounding the offence and the explanation(s) offered by the applicant.

17.6. 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 of the following offences:
17.6.1. Murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or
17.6.2. Serious class A drug-related offences, robbery, burglary, theft, deception or fraud.
17.6.3. 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.
17.6.4. If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

18. Single Central Register

18.1. The School maintains a Single Central Register (SCR) of staff appointments, including volunteers and others brought into the School to provide additional teaching or instruction (such as sports coaches), supply staff and governors in accordance with the guidance of the DfE.

18.2. The SCR is managed and only accessed by authorised staff in HR.

19. Retention of Records and Security of Disclosure Information

19.1. The School is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the School will retain on his/her personnel file (paper and/or electronic) any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications.

19.2. Disclosure information and other confidential documents issued by the DBS are securely stored, with access only permitted to persons designated by the proprietor for this purpose. These are securely destroyed after a period of six months.

19.3. This documentation will be retained by the School for the duration of the successful applicant's employment with the School. It will be retained for a period of seven years (minimum) after employment terminates, after which time it will be securely destroyed.

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

19.5. The School will keep a record of the date of 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, with access only permitted to persons designated by the proprietor for this purpose.

20. Duty to Refer

20.1. The School has a duty to refer to agencies as part of our safeguarding responsibility. Consequently, the School will refer to the Disclosure & Barring Service (DBS) when an individual has applied despite being barred from working with children or is removed from regulated activity or has resigned prior to being removed, because they have harmed, or pose a risk of harm to a child.

20.2. If the individual referred to the DBS is a teacher, the School may make a referral to the Teaching Regulation Agency (TRA) as and where appropriate.

21. Equal Opportunities

21.1. The School does not discriminate between candidates on the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation.

21.2. The School is mindful of the requirements relating to the recruitment of ex-offenders whilst taking into account its safeguarding responsibilities.

22. Training

22.1. HR and senior members of staff, including the Head, should have Safer Recruitment training. This training is refreshed every 3 years.