Recruitment, Selection and Disclosures Policy

Policy date:	September 2026
Date of next review:	September 2027
Owner:	Chief Financial and Operations Officer
Leadership Team:	Operations Leadership Team
Intended audience:	Prospective staff and all current staff
Location:	School Portal, Governor Portal and website

1. General

1.1 Haileybury (the **School**) is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

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

1.3 All queries on the School's Application Form and recruitment process must be directed to the HR Department in the first instance.

1.4 An entry will be made on the Single Central Register for all current members of staff at the School, including the proprietorial body.

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

1.6 This policy applies to all staff recruitment. A full and transparent recruitment process must be followed in respect of all vacancies. This policy should also be read alongside the School's Conflict of Interests Policy (available on the Policies page of the School Portal), which contains guidance on employing relatives of staff members.

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

2. Scope of this policy

2.1 This Recruitment, Selection and Disclosures 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.

2.2 In the case of agency or contract workers, the School sets out its safeguarding requirements in the contract between the relevant organisation and the School, and the School will obtain written confirmation from the agency or company that they have carried out the same checks as the School would otherwise perform on any individual working at the School.

2.3 The School conducts identity checks on agency and contract workers on arrival at the School. In the case of agency workers (including supply staff) and any contract workers whose duties meet the statutory threshold for regulated activity (working more than three days in any 30-day period, or overnight), the School must be provided with a copy of the appropriate level of DBS check and Barred List check prior to deployment. Under statutory rules, the presence of supervision no longer exempts these individuals from these checks. Please see the Visitors, Contractors and Site Security Policy (available on the Policies page of the website and of the School Portal) for further details.

2.4 The School will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure, right to work in the UK, barred list, prohibition, qualifications, overseas checks plus those checks set out in KCSIE as 'pre-employment' checks).

2.5 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, namely the Master.
- A person who is accountable only to the Master or the Governors, and who is responsible for the overall management and control of the charity's finances. At Haileybury, this would currently be the Chief Financial and Operations Officer.

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.

2.6 In respect of contractors, unchecked contractors will under no circumstances be allowed to work unsupervised in the School. The School will determine the appropriate level of supervision depending on the circumstances. Please see the Visitors, Contractors and Site Security Policy for further information.

2.7 Any staff who transfer into the School's staff under TUPE will be required to undertake the statutory requirements with regard to safer recruitment checks.

3. Application Form

3.1 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, but are permitted to be submitted alongside an Application Form.

3.2 The School will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. Candidates for employed posts will receive a Job Description and Person Specification for the role applied for.

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

3.4 The successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service ("DBS") for an enhanced DBS check. A check of the Barred List will also 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.

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

3.6 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.

3.7 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.

3.8 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.

4. Interview Shortlisting & Invitations

4.1 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.

4.2 As part of the shortlisting process, and unless there is a good reason not to, the School will carry out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

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

4.4 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. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

4.5 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.

4.6 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.

4.7 The School requests that all candidates invited to interview also bring with them:

- valid documents suitable for verification of identity for an enhanced DBS application, to be used should the candidate be successful. Examples include a current driving licence, a valid passport, or 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; and

- where applicable, proof of entitlement to work and reside in the UK.

4.8 It is a legal requirement that candidates bring original copies of documents (e.g. documents noted above). Photocopies or certified copies are not sufficient.

4.9 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.

5. Interview Arrangements

5.1 The interview panel should consider the structure of the interview and how they will test the candidates. Depending on the role being recruited, this may include (but not limited to) competency based questions, presentations, tests, observations, and involvement from multiple areas of the School. The recruiting manager will ensure that the shortlisted candidates are provided with details of the interview process, including all selection steps prior to the interview process.

5.2 Prior to the interview, the School will provide a reasonable amount of time for a candidate to prepare for all of, or a specific part of the interview process (best practice is to allow up to five working days' notice). This should include how the tests will be carried out, enabling any candidate with a disability to determine if they will need reasonable adjustments. The same written information will be given to all candidates.

5.3 Candidates will be asked if there are any reasonable adjustments that could be made so that they can participate fully and fairly in the interview process. The accessibility of the interview location should be proactively considered when preparing for interviews, and it may be necessary to delay scheduled interviews to accommodate certain reasonable adjustments. Recruiting managers should speak to the HR department to discuss any reasonable adjustments required for candidates.

6. The Interview Panel

6.1 All formal interview processes will include a panel of at least two people chaired by a senior member of staff, relevant to the role being recruited. It is recommended best practice that at least one person on the appointment panel will have undertaken safer recruitment training.

6.2 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. In unavoidable circumstances, the interview may be conducted virtually; however, no appointment will be confirmed unless the candidate has been seen in person.

6.3 Wherever possible, the panel should be balanced (for example, gender, age or ethnicity) and where a majority exists for a particular characteristic, care should be taken by the panel chair to ensure there is no bias being demonstrated by the panel in the selection process. The recruiting manager can consider inviting panel members from other departments or teams to support a fair and equitable recruitment process.

6.4 The interviewers will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made in consultation with the Master or Chief Financial and Operations Officer as appropriate, as to whether or not an interviewer should withdraw from the panel. Please also refer to the School's Conflict of Interests Policy (available on the Policies page of the School Portal) in relation to the employment of family members.

6.5 For appointment of a school counsellor or psychotherapist, the panel will include at least one member of staff who is an experienced, accredited practitioner.

6.6 The interview panel should make clear and accurate notes of the answers provided by the candidate during the interview. The interview notes should be a precise reflection of the interview and only include information provided by the candidate in response to the questions, or relevant insights identified by the panel member regarding the suitability to the role applied for. All interview notes recorded by the interview panel could be requested by the candidate and should remain professional to uphold a fair and transparent process.

7. Conditional offer of appointment and pre-appointment checks

7.1 Any offer to a successful candidate will be conditional upon:

- receipt of at least two satisfactory references;
- verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK;
- 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 the candidate is not subject to a prohibition order issued by the Secretary of State or any sanction or restriction imposed (that remains current) by the historic General Teaching Council for England before its abolition in March 2012. Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:
  - planning and preparing lessons and courses for pupils;
  - delivering and preparing lessons to pupils;
  - assessing the development, progress and attainment of pupils; and
  - reporting on the development, progress and attainment of pupils;
- verification of professional qualifications, including Qualified Teacher Status, where appropriate;
- verification of successful completion of statutory induction period (for teaching posts, applicable to those who obtained QTS after 7 May 1999);
- where the successful candidate has worked or been resident overseas, such further checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing the School with proof of their past conduct in the form of a letter of professional standing from the professional regulating authority in the country in which they have worked;
- 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, Executive / Senior Leadership Team and teaching Heads of Department; and
- evidence of satisfactory medical fitness by completion of a pre-employment health declaration form. The information contained in the questionnaire will be held by the School

in strictest confidence and processed in accordance with the Recruitment Privacy Notice and Data Protection Policy. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed workload, extra-curricular activities, and/or layout of the School.

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

8. References

8.1 The School will seek the references referred to in section 5 above for shortlisted candidates (including internal applicants) and will approach previous employers for information to verify particular experience or qualifications, before interview (unless there is good reason not to do so at this stage). One of the references must be from the applicant's current or most recent employer. References must be received by a senior person with appropriate authority or Human Resources. 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, in which case the School will take up such references after an offer has been made, but prior to any appointment being confirmed.

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

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

8.4 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.

9. Criminal records policy

9.1 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 DBS checks.

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

9.3 There are limited circumstances where the School is permitted to accept a check from another educational institution where the new member of staff ("M") has worked in:

a) a school or a maintained school in England in a position which brought M regularly into contact with children or young persons;

b) a maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or

c) an institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons;

during a period which ended not more than three months before M's appointment. In these circumstances the School may apply for a disclosure but is not required to do so. It is, however, the School's policy to obtain a DBS check on all new staff, even if the above criteria apply. A new, separate barred list check will also always be obtained.

9.4 **DBS Update Service:** Where an applicant subscribes to the DBS Update Service the applicant must give consent to the School to check there have not been changes since the issue of a disclosure certificate. The applicant must provide the School with a copy of the original disclosure certificate in order to perform the check. A barred list check will still be required.

9.5 **If disclosure is delayed:** A short period of work is allowed under controlled conditions, at the Master's or Chief Financial and Operations Officer's discretion. However, if an 'enhanced disclosure' is delayed, the Master or Chief Financial and Operations Officer may allow the member of staff to commence work:

- without confirming the appointment;
- after a satisfactory check of the barred list if the person will be engaging in regulated activity and all other relevant checks (including any appropriate prohibition checks) have been completed satisfactorily;
- provided that the DBS application has been made in advance;
- with appropriate safeguards taken (for example, supervision);
- as long as safeguards are reviewed at least every two weeks by the Master, Chief Financial and Operations Officer or DSL;
- the person in question is informed what these safeguards are; and
- a note is added to the Single Central Register and a risk assessment is placed on the employee's file to evidence the measures put in place.

10. Retention, security of records and data protection obligations

10.1 The School will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policies. Copies of DBS certificates will not be retained.

10.2 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 and the Data Protection Policy.

Appendix A

Policy on the recruitment of ex-offenders

1. 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.

2. 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.

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

4. 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:

   a) receives an application from a disqualified person;

   b) is provided with false information in, or in support of, an applicant's application; or

   c) has serious concerns about an applicant's suitability to work with children.

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:

   a) whether the conviction or other matter revealed is relevant to the position in question;

   b) 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);

   c) the seriousness of any offence or other matter revealed;

   d) the length of time since the offence or other matter occurred;

   e) whether the applicant has a pattern of offending behaviour or other relevant matters;

   f) whether the applicant's circumstances have changed since the offending behaviour or other relevant matters;

   g) in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and

   h) the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

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 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.

7. 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.

8. 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.

Version history		
Date	**Reviewed by**	**Notes**
September 2022	SLT	New policy adopted in accordance with ISBA recommended template
January 2024	HR Manager SLT	Minor updates Reviewed and approved
February 2024	Governors' Safeguarding and Wellbeing Committee	Reviewed
January 2025	HR Manager; SLT	Minor updates
September 2025	Executive Leadership Team	Updated to reflect CFOO role
January 2026	Head of HR/ Operations Leadership Team (OLT)	Reviewed and updated.
January 2026	Executive Leadership Team (ELT)	Reviewed and approved.
February 2026	Head of HR/ ELT	Updated to reflect selection procedure for counsellors and psychotherapists. Approved by ELT.
July 2026	OLT	Reviewed and updated
August 2026	ELT	Reviewed and approved