



CITY OF LONDON SCHOOL FOR GIRLS RECRUITMENT POLICY

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Date policy last reviewed:	November <u>September</u> 2021
Approved by:	Board of Governors
Date approved:	7 th December 2020

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1. Introduction

- 1.1 City of London School for Girls 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.
- 1.2 The School is also committed to providing a supportive and flexible working environment for all of its members of staff. The School recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.
- 1.3 This policy should be read in conjunction with:
- The School's Safeguarding and Child Protection Policy
 - The City of London Corporation's Code of Conduct (and Code of Conduct for Teachers)
 - The City of London Corporation's Whistleblowing Procedure
- 1.4 This policy has been drawn up in line with Part 3 (Welfare, health and safety of pupils) and Part 4 (Suitability of staff, supply staff and proprietors) of the Independent Schools Standards Regulations and has been updated in accordance with Part 3 (Safer Recruitment) of the Department for Education (DfE)'s *Keeping Children Safe in Education: statutory guidance for schools and colleges* (September 2021).

2. The aims of this policy

- 2.1 *Keeping Children Safe in Education: statutory guidance for schools and colleges* (September 2021) states:
- "Governing bodies and proprietors should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. The School or College should have written recruitment and selection policies and procedures in place".*
- 2.2 Through the implementation of this policy, the School aims to ensure:
- that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position.
 - that all applicants are considered equitably and consistently.
 - that no 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.

- that the School creates a culture of safe recruitment and, as part of that, adopts recruitment procedures that help deter, reject or identify people who might abuse children.
- that the School meets its commitments to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.
- compliance with all relevant recommendations and guidance including the recommendations of the DfE in *Safeguarding Children and Safer Recruitment in Education* and the code of practice published by the Disclosure and Barring Service (DBS).

3. Recruitment Process

3.1 The recruitment process is designed to ensure the suitability of persons appointed as members of staff at the School, such that:

- No such person is barred from regulated activity relating to children in accordance with section 3(2) of the 2006 Act where that person is or will be engaging in activity which is regulated activity within the meaning of Part 1 of Schedule 4 to that Act.
- No such person carries out work, or intends to carry out work, at the School in contravention of a prohibition order, or any direction made under section 128 of the 2008 Act or section 142 of the 2002 Act, or any disqualification, prohibition or restriction which takes effect as if contained in either such direction.
- The School carries out appropriate checks (which must be completed before a person's appointment) to confirm in respect of each such person the person's identity, medical fitness, right to work in the UK and, where appropriate, the person's qualifications.
- Where relevant, an enhanced criminal record check is made in respect of that person and an enhanced criminal record certificate is obtained before, or as soon as practicable after, that person's appointment.
- Further checks are made as the School considers appropriate in the case of any person for whom, by reason of that person living or having lived outside the UK, obtaining such a certificate is not sufficient to establish the person's suitability to work in a school.

3.1.1 Advertising

All posts are advertised clearly stating that they are exempt from the Rehabilitation of Offenders Act 1974, Exceptions Order 1975 (as amended in 2013) and that as part of the selection process the successful applicant will be required to obtain a Disclosure and Barring Service enhanced check. The School's safeguarding statement is also included in all job advertisements¹:

¹ As displayed in recruitment information, including job adverts and application forms.

“City of London School for Girls is committed to safeguarding and promoting the welfare of children and applicants must be willing to undergo child protection screening appropriate to the post, including checks with past employers and the Disclosure and Barring Service.”

3.1.2 Recruitment Personnel

When a position becomes vacant the ~~Deputy Head Academic, in the case of Teaching Staff, or the Bursar, in the case of Support Staff, line manager~~ will, in collaboration with the HR Department, undertake procedures to ensure a safe and successful appointment. A member of staff with appropriate Safer Recruitment training will be involved in the Selection Panel for **all** appointments².

Safer recruitment training ~~is to~~~~has been~~ undertaken by the HR Department, Deputy Heads, Headmistress, Bursar and others involved regularly in the recruitment of staff.

3.1.3 For all posts the line manager with the hiring need will initiate the process by completing an authority to recruit form, to be signed off by the Head, Bursar and Deputy Head Academic. The need will be kept under continuous review in the Staffing and Recruitment Group.

~~For the recruitment of Teaching Staff~~

~~The Head, assisted by SMT and the appropriate Head of Department, will lead on the recruitment process.~~

3.1.4 **~~For the recruitment of Support Staff~~**

~~The Bursar, assisted by the HR Department and, if required, members of the SMT and the relevant Head of Department, will lead on the recruitment process.~~

3.2 Application Form

The application form used by the School clearly states that posts are exempt from the Rehabilitation of Offenders Act. All applicants are required to complete the form as fully and effectively as possible to ensure that the Selection Panel receives consistent and equal information from all applicants.

The application form requires the applicant's full name and any previous name and date of birth. It also requires the applicant's full education, employment, volunteering and other history **with no gaps**. Reasons for leaving all previous posts are requested. All applicants must provide the names of two referees including the current or most recent employer. All applicants must disclose all convictions spent and unspent. CVs are not accepted as an alternative to the application form but details of previous employment and training may be submitted on separate pages to aid completion.

3.3 Job Description, Person Specification and School / Department Information

² The School Staffing (England) Regulations (2009) require governing bodies of maintained schools to ensure that at least one of the persons who conducts an interview has completed safer recruitment training; the School also operates in line with this requirement.

These contain the School's safeguarding statement and state clearly the need for an enhanced [with children's barred list](#) DBS check. The job description lists the main responsibilities and duties of the position which the successful applicant will undertake and makes reference to the responsibility for safeguarding and promoting the welfare of children. The person specification details the skills, experience and qualifications the School is looking for and includes specific reference to suitability to work with children. The person specification will be used to select the shortlisting criteria. The School / Department Information gives candidates up-to-date information about the School and the specific department.

3.4 Selection of candidates and short-listing

3.4.1 All application forms received, [including those from internal candidates](#), will be read carefully and considered independently by the Selection Panel and a short-list drawn up.

- ~~For main-scale Teaching Staff posts, the Head, Deputy Head Academic and relevant Head of Department liaise and select.~~
- ~~For Heads of Department posts, the Head liaises with the Deputy Head Academic and other members of the SMT as required.~~
- ~~For Senior Management posts, the Head liaises with the Senior Deputy Head and other members of the SMT as required.~~

3.4.2 ~~For candidates not short-listed, the HR Department records for each candidate the reasons for not short-listing.~~ [Notes on shortlisting decisions are retained in](#) These records are retained by the HR Department for 12 months.

3.4.3 ~~Applications for internal posts (including positions of responsibility) are considered by the relevant members of the SMT.~~

3.4.4 ~~For Support Staff posts, the HR Department short-lists with the Bursar or the relevant member of SMT or Head of Department.~~

3.4.5 ~~For candidates not short-listed, the HR Department records for each candidate the reasons for not short-listing. These records are retained by the HR Department for 12 months.~~

3.5 Interview

3.5.1 Teaching staff

The HR Department will co-ordinate all ~~teaching~~ interviews and will liaise directly with ~~SMT, Head of Department~~ [the interview panel \(containing the line manager\)](#) and applicants short-listed. The HR Department contacts candidates regarding the practical arrangements for the interview visit and, where necessary, Heads of Department [may](#) contact candidates to ~~further~~ discuss [further](#) the lesson(s) they will be required to teach [or any additional tasks.](#)

3.5.2 Prior to ~~or during~~ the interview, candidates will be informed that:

- proof of ID, [right to work](#), address and qualifications must be brought in on the interview day ~~(to ensure right to work in the UK).~~
- ~~Details of referees references~~ will be requested, including ~~making contact with the~~ current School at which the applicant is working or last worked, ~~if he or she is not currently working in a school (in order to confirm employment details and reasons for leaving).~~ [These may be taken up before the interview](#)
- all pre-employment checks must be completed before an appointment can be confirmed.
- the interview panel will ensure that any discrepancies and anomalies are scrutinised during the interview process, including accounting for any gaps in education and employment (see *Previous Employment History* section below).
- the interview panel will explore the candidates' suitability to work with children [by asking a number of safeguarding questions](#).

3.5.3 **Support staff**

~~The HR Department will co-ordinate all support staff interviews with the Bursar (and relevant members of the SMT or Head of Department as required). The interview procedure (as above) will be followed, in line with the City of London Corporation Human Resources Policy.~~

3.5.4 **Following the interview, for all Staff**

Notes taken at interview and in the 'Decision Meeting' will be dated and retained on file by the HR Department. Notes taken with regard to unsuccessful candidates are retained for 12 months. Feedback is ~~provided~~ [offered](#) to candidates, ~~where requested~~. Feedback requests are directed to the HR Department.

3.6 **Recruitment Checks**

[The following checks are required for all staff prior to their start date at the school. New checks or additional checks may also be required on changing roles or on promotion within the school. These checks also apply to others delivering services in the school where they fall under the definition of 'staff' used in Part 4 of the ISI Commentary 2021.](#)

3.6.1 **Barred List and Prohibition from Teaching checks**

A Barred List check is required for all new appointments to the School. This is normally conducted as part of a DBS check (see below), but a separate barred list check must be undertaken in the event that:

- a new enhanced disclosure with barring information is required but is not received in advance of a member of staff starting work in regulated activity.
- a pre-existing enhanced DBS check is accepted under the 'three-month rule' for a member of staff starting work in regulated activity.
- a pre-existing enhanced DBS check without barring information is accepted from a candidate who has subscribed to the DBS update service.

Teaching Staff appointments will be subject to checks by the HR Department to determine that they are not subject to a prohibition order issued by the Secretary of State, or other similar sanction or restriction imposed as a teacher.

3.6.2 DBS Disclosure³

An enhanced criminal records check ('DBS check') is required for all new appointments to the school. This includes volunteers- [in regulated activity](#) and School Governors (see below). DBS checks are carried out by HR staff at the School and / or, for Support Staff and Governors, by HR staff at the City of London Corporation. During employment with the School, all staff are required to declare any convictions, cautions or reprimands, warnings or bind-overs.

~~Where a member of staff moves from a non-teaching to a teaching role, additional checks may be required.~~

If the disclosure is delayed (such that the DBS certificate has been applied for but is not available before a person starts work in regulated activity), the Headmistress may allow the member of staff to commence work subject to the following pre-conditions:

- a satisfactory check of the Barred List has been completed
- all other relevant checks have been completed satisfactorily
- it is done without the School confirming the appointment
- risk assessment carried out
- appropriate safeguards have been put in place, as determined by a risk assessment, which have been clearly communicated to the member of staff, and which will be regularly reviewed (until such time as the DBS certificate is available; see below). Risk assessments must be signed by the member of staff, the line manager responsible for the supervision and by the Head (or her delegate from the SMT). A copy of any such risk assessment will be sent to HR to file on the personal file.
- all staff will be automatically registered on the DBS Update Service [where a CLSG DBS certificate has been obtained.](#)

Note: Guidance on risk assessment criteria, together with the Risk Assessment pro-forma which must be completed and signed off by the relevant authority before a person starts work, is provided at Appendix 2. If the risk is assessed at 'Medium' or 'High', the person should not start work until all proper checks have been completed. The risk assessment ~~should~~**must** be reviewed every two weeks and re-signed (where required) until all other checks are satisfactorily completed. If, at any stage, the new member of staff's behaviour is of concern, or the protection measures are not able to be implemented or sustained, then the permission to work must be withdrawn until such time as all other checks are satisfactorily completed. HR must be informed if there are any concerns

3.6.3 Identity Checks

All candidates must provide evidence of their identity and prove their right to work in the UK. They must bring to their interview (or, when requested, immediately thereafter) proof of identity and National Insurance number (if available). Acceptable proofs of identity include a British passport or current driving licence, passport /birth certificate where available (preferable under *Keeping Children Safe in Education*

³ Reference is made to the 'Flowchart of Disclosure and Barring Services Criminal record checks and barred list checks' in the DfE's *Keeping Children Safe in Education*.

September 2021 best practice guidance)/ identity card issued by an EEA country or a passport from another country that contains a valid Visa / Permit, and acceptable proofs of NI number include a NI card or recent P60/P45.

Applicants are also required to provide proof of address (such as a utility bill, bank statement or similar) on the interview day (or, where agreed, immediately thereafter). Applicants who are unable to bring these proofs of identity and address to interview must do so before taking up appointment and before the appointment is confirmed.

3.6.4 **Medical Fitness**

~~SAI~~ successful applicants are required to complete a medical questionnaire to ensure the appropriate level of physical and mental fitness before any offer of appointment is confirmed. A medical declaration may be used where the questionnaire has not been assessed by Occupational Health prior to the start date or for roles where a full medical evaluation by Occupational Health is not required by the City of London Corporation.

3.6.5 **Previous Employment History**

Complete information about previous education and employment must be provided along with satisfactory explanations for any gaps in employment. The School will require applicants to explain at interview (or later if necessary) any employment gaps apparent from their application form.

3.6.6 **References**

Two professional references must be provided, one of which will be from the candidate's current (or most recent) employer. **Where a candidate has previously worked in a school but this was not the most recent employer a reference should also be sought from the school concerned.** This reference should be provided by the Head Teacher or other suitable person with knowledge of disciplinary and safeguarding issues or verified by the Head Teacher or other suitable person. ~~References~~ These should always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support the appointment decision. Any discrepancies or anomalies must be followed up. ~~Direct contact by telephone is required with each referee to verify the reference. References must be verified, usually by direct contact by telephone. References should include es are required to answer~~ specific responses to questions about the candidate's suitability to work with children. If a verbal reference is taken then notes are taken, dated and signed and filed.

Where it is not possible to obtain two professional references due to the candidates previous work history, discretion may be used in determining appropriate referees. Questions about safeguarding should be asked regardless of the context of the reference.

Any information provided through references concerning past disciplinary action or allegations that are disclosed should be considered carefully when assessing the applicant's suitability for the post.

3.6.6 **References for internal positions**

Two references should also be obtained for recruitment for internal positions (where an existing member of staff applies for a role or position within the School) including for:

- internal promotions
- position moves
- new, but not renewed, responsibility allowances

Typically, one reference will be sought from the member of staff's line manager and a second one from a senior member of the teaching staff. These references are supplied on a standard form available from the HR Department.

3.6.7 **Qualification Requirements**

Applicants must be able to demonstrate they have obtained any academic or vocational qualifications relevant to the post and claimed by them in their application form and which were taken into account when making the appointment. Applicants will be asked to provide original copies of these when attending interview. Applicants who are unable to bring these to interview must do so before taking up appointment and before the appointment is confirmed. Discretion may be used for qualifications gained many years previously where the evidence is not available but a subsequent work history and experience are considered sufficient.

3.6.8 **Suitability checks for applicants who have lived or worked outside the UK**

If, because of a person living or having lived outside of the UK, a DBS check is not considered sufficient to establish suitability to work in a school, the School will carry out such further checks as deemed necessary, in line with relevant DfE and Home Office guidance. The checks usually involve a police check from the overseas country or country but where this is not possible additional references from the country concerned may be sought. All new appointments where persons are living or have lived outside the UK for more than three months within 10 years of their application (once over the age of 18) will be subject to such additional checks.

Where the additional checks have not been received before the person is due to start work they may be permitted to commence employment with a risk assessment in line with those for members of staff commencing work before their DBS certificate has been received. The HR Department will be responsible for co-ordinating these checks and for coordinating the checking for evidence of permission to work.

Where a person is an overseas-qualified teacher, the School will follow the Teaching Regulation Authority (TRA) guidance 1 January 2021 on requirements for overseas-qualified teachers and will ensure staff have the relevant qualifications.

All applicants (for any role) who have lived and worked in any country overseas within the last 10 years of their application must undergo:

- all the checks as for other staff (including an enhanced DBS check, even if the applicant has never been to the UK), plus

- any additional checks the School considers appropriate: these additional checks could include, where available, a criminal records check for overseas applicants, in line with relevant DfE and Home Office guidance.
- for applicants for teaching roles, these additional checks could also include a letter of professional standing from the professional regulating authority (in the country/countries the applicant has worked) confirming they have not imposed sanctions or restrictions or are aware the applicant is unsuitable to teach where available. This will be assessed on a case by case basis by the Head and HR.

Where this information is not available, the Schools will seek alternative methods of checking suitability and / or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

HR will be responsible for coordinating these suitability checks, and for coordinating the checking for evidence of permission to work. Where a person is an overseas-qualified teacher, the School will follow the TRA guidance on requirements for overseas-qualified teachers and will ensure staff have the relevant qualifications.

3.6.9 **Prohibition from management of independent schools check**

For new appointments to management positions, checks must be made to ensure that a section 128 direction have not been made by the Secretary of State, precluding that person from a management role.

Such management positions include:

- The Head
- All staff on the Senior Management Team
- Teaching positions with Head of Department responsibility
- ~~Teaching positions with management responsibilities~~ Other senior management roles
- ~~Proprietors (see below)~~ Governors

Childcare disqualification

Childcare disqualification is an additional requirement for those working in wraparound care for children up to the age of 8, such as breakfast clubs and after school care.

For staff who work in childcare provision, or who are directly concerned with the management of such provision, employers need to ensure that appropriate checks are carried out to ensure that the individuals are not disqualified under the Childcare Disqualification Regulations 2018. Details of any staff who meet these criteria are provided annually by the Assistant Head (Preparatory Department) and on appointment.

3.7 **Conditional Offer of Appointment**

~~An offer of appointment will be made only after the satisfactory references have been received (written and / or verbal) and after approval by the Head (for Teaching Staff) or the Bursar (for Support Staff).~~

The letter of appointment will make it clear that the offer is subject to satisfactory completion of the required safeguarding checks and right to work in the UK as outlined above.

- The receipt of two satisfactory written references, one of which must be from the candidate's current or most recent employer.
- A satisfactory medical assessment (and, if considered desirable, follow up examination by the Occupational Health Physician) or completed medical declaration.
- Verification of the candidate's qualifications, where those are an essential requirement for the post.
- Proof of the candidate's right to work in the UK^l
- Proof of address (e.g. a utility bill (not a mobile phone bill) or bank statement, dated within the past 3 months, or council tax bill, dated within the past 12 months).
- A satisfactory enhanced Disclosure & Barring Service and Children's Barred List check.
- Any And any additional checks appropriate required for Teaching Staff.
- Any additional checks required for management staff.
- And any additional checks the School considers appropriate for overseas applicants (please refer to 3.6.8).

4. Supply Staff and Trainee / Student teachers

- 4.1 When a Supply Agency is used to provide temporary Teaching Staff to the School, the Senior Deputy Head and HR Department will ensure that the agency supplies appropriate documentation giving details of all the checks that the agency has carried out on that person to ensure that they are suitable to work in the School. That documentation will be retained by HR staff.
- 4.2 Temporary Teaching Staff from a Supply Agency are required to show current photo ID and their DBS certificate when they arrive at the School. This documentation will be retained by HR staff.
- 4.3 When a Supply Agency is used to provide temporary Support Staff to the School, the HR Department will ensure that the agency supplies appropriate documentation giving details of all the checks that the agency has carried out on that person to ensure that they are suitable to work in the School. That documentation will be retained by HR staff.
- 4.4 With trainee or student teachers who are on temporary positions in the School, the member of the SMT with oversight of such persons (usually the Assistant Head

Teaching and Learning) and the HR Department will ensure that the all necessary checks are completed (Appendix 1).

5.

5.1

Contractors and Third-Party Staff (Regular and Non-Regular)

5.2

When a contractor is used to provide a service to the School through placements of third-party staff, HR will determine with the relevant Line Manager whether or not the person doing the work contractor is defined as regular or irregular. HR will ensure that the contractor supplies appropriate documentation giving details of all the checks the contractor has carried out on that person to ensure they are suitable to work in the School. That documentation will be retained by HR staff.

The Contractors Clearance Protocol has been written in conjunction with the School's Recruitment Policy and this is available via the schools HR department.

6. **Governors (~~The Proprietor~~)**

6.1 **DBS, Barred List and Prohibition checks for Governors**

The DBS maintains 'barred lists' of individuals who are unsuitable to work with children. Where barred list information is requested, and 'children's workforce independent schools' is specified in the parameters for that check, the certificate will also detail whether the applicant is subject to a direction made under section 128 of the Education and Skills Act (2008). Such a direction prohibits an individual from taking part in the management (including being a governor) of independent schools in England.

6.2

The School, in conjunction with City of London Corporation HR staff, undertakes to perform all such checks as are required to confirm the suitability of governors (~~'the Proprietor'~~, as described in Part 4, Paragraph 20 of the Independent Schools Standards Regulations).

7. **Staff Induction and Training**

7.1 **Safeguarding and Child Protection**

All appointed staff are provided with the following documents, and they are required to sign a register to confirm they have been read and understood them:

- The Safeguarding and Child Protection Policy (including the Staff Safeguarding Code of Conduct) and the identity and role of the Designated Safeguarding Lead (DSL) and Deputy DSLs
- Part 1 of the DfE's *Keeping Children Safe in Education* (including Annex A for those who work directly with children)
- The Staff Code of Conduct, including the Whistleblowing Procedure
- Pupil Behaviour Policy ([teaching staff only](#))
- Data Protection Policy (Employees)
- Mental Health and Wellbeing Policy
- Health and Safety Policies

Safeguarding and Child Protection is also covered in the induction training for all staff (including, where appropriate, an online child protection course), which includes the arrangements for Children Missing in Education.

- 7.2 Further guidance can be found in the Induction Procedures and School Staff Development Policy in the Staff Team or from the Senior Deputy Head or HR Department.

8. Equal Opportunities

- 8.1 The School promotes employment practices designed to eliminate discrimination. ~~All~~ applicants are provided with an equal opportunities monitoring form to complete.

- 8.2 The School aims to ensure that:
- no applicant for a job receives less favourable treatment on the grounds of:
 - sex
 - age
 - disability
 - sexual orientation
 - gender reassignment
 - religion or belief
 - race (including colour, ethnic or national origins)
 - pregnancy and maternity
 - marriage and civil partnership
 - all applicants will be treated equally and fairly in the recruitment process outlined in this policy
 - the successful applicant will be recruited (and subsequently trained) on the basis of ability, experience and skill(s) to undertake the job successfully, as defined within the job description and person specification.

- 8.3 Further information and guidance is given in the City of London Corporation Equal Opportunities in Employment Policy, which is available from the HR Department.

Appendix 1: Safer Recruitment Checklist

NEW STARTER CHECK LIST

Section 1 – Employee Details

<u>Employee Name</u>		<u>Start Date</u>	
		<u>End Date</u>	
<u>Job Title</u>			
<u>Department</u>			
<u>Line Manager</u>			

Section 2 – Pre-Employment

<u>Action</u>	<u>Date received / actioned and completed by (HR Initials)</u>	<u>Notes (Type of Doc or Comments for SCR)</u>
<u>Ensure the following details have been received/verified by HR and copies placed in electronic and hard personnel file.</u>		
<u>Application Form / CV Checked</u>		
<u>Interview Notes</u>		
<u>Job Description</u>		
<u>Proof of Identity</u>		
<u>Proof of Right to Work</u>		
<u>Driving Licence (if required)</u>		
<u>Proof of Address</u>		
<u>Reference 1 Verified (Verbally)</u>		
<u>Reference 2 Verified (Verbally)</u>		

<u>Medical Clearance</u>		
<u>Academic and/or Professional Qualifications</u>		
<u>Bank Details</u>		
<u>HMRC Starter Checklist</u>		
<u>National Insurance Document</u>		
<u>Pension Forms</u>		
<u>Next of Kin Details</u>		
<u>Equality and Diversity Form</u>		
<u>DBS Certificate checked date</u>		
<u>Barred List checked date</u>		
<u>DBS Registered to update service</u>		
<u>Overseas Check (if required)</u>		
<u>Prohibition Check Teaching (if required)</u>		
<u>Prohibition Check Management (if required)</u>		

Section 3 – Employment Documents

<u>Action</u>	<u>Date received / actioned and completed by (Initials)</u>	<u>Notes</u>
<u>Ensure the following details have been received/verified by HR and copies placed in electronic and hard personnel file.</u>		
<u>Confirmation of Appointment</u>		
<u>Signed Employee Offer Letter</u>		
<u>Signed Contract of Employment</u>		

<u>PAY2 Form sent to payroll</u>		
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Section 4 – System On-Boarding

<u>Action</u>	<u>Date actioned and completed by (Initials)</u>	<u>Notes</u>
<u>SMT sign off</u>		
<u>SCR</u>		
<u>First audit</u>		

Appendix 2: Risk Assessments

- 1.1 ~~There would need to be exceptional and justifiable circumstances for employment to commence prior to DBS clearance. Where necessary, a new member of staff may commence employment prior to receipt of a DBS certificate.~~ Such a decision can only be taken by the Headmistress or her delegate from the Senior Management Team, following a risk assessment. In any circumstances, potential employees cannot commence work prior to the Barred List check being completed. ~~Nor may they commence work prior to the submission of~~ their completed disclosure application being submitted to the DBS and all other checks being in place.
- 1.2 There must be a record of the Risk Assessment and decision, including “sign off” by the Headmistress, to ensure the auditability and accountability of the judgement. The judgement is an assessment of the risk versus the consequences of the decision. The Risk Assessment pro-forma (see below) is to be used to act as an auditable record of the decision made following risk assessment and must contain the signature of one of the accountable persons. ~~This responsibility cannot be delegated.~~
- 1.3 If a decision is taken to allow an employee to commence work prior to receiving the DBS certificate, the employee must have completed and submitted their completed disclosure application to the DBS, and their contract of employment should remain subject to this condition being met. The application’s progress within the DBS system should be checked and monitored on a regular basis.
- 1.4 Appropriate supervision arrangements must be put into place during the “waiting period”. The employee must be notified of the supervision arrangements that are in place. The situation must be checked and monitored at least every two weeks. The Headmistress, Senior Deputy Head or Bursar remains accountable during this time, until the clearance is received, checked and suitability confirmed.
- 1.5 If at any stage, the new member of staff’s behaviour is of concern, or the protection measures are not able to be implemented or sustained, then the permission to work must be withdrawn until such time as all checks have been satisfactorily completed.

City of London School for Girls

Risk Assessment- Employee starting without DBS certificate or overseas police check

Employee name	
Post title	
Department	
Line Manager	
Start date	
Date DBS applied for	

Context	
Barred list check date	
References complete	
File complete	
RISK ASSESSMENT prior to mitigation	High <input type="checkbox"/> Medium <input type="checkbox"/> Low <input type="checkbox"/>
MITIGATION Mitigating factors and actions taken since start date or ways of working adopted to minimise risk, including employee supervision, where appropriate	
RISK ASSESSMENT After mitigation	High <input type="checkbox"/> Medium <input type="checkbox"/> Low <input type="checkbox"/>

APPROVAL To be signed by Head or Senior Deputy Head	Signed: Date: Name: Comments:
Manager signature	Signed: Date: Name:
Employee signature	Signed: Date: Name:
Supervisor signature If employee to be supervised on site	Signed: Date: Name:
Risk assessment to be reviewed Normally two week intervals	Date:

REVIEW 1	Date:
Approval To be signed by Head or Senior Deputy Head	Signed: Name:

REVIEW 2	Date:
Approval To be signed by Head or Senior Deputy Head	Signed: Name:

REVIEW 3	Date:
Approval To be signed by Head or Senior Deputy Head	Signed: Name:

REVIEW 4	Date:
Approval To be signed by Head or Senior Deputy Head	Signed: Name:

RISK ASSESSMENT SIGNED OFF	Date:
	Signed: Name:

Add further two weekly sign offs as necessary.

- 1 **~~What are the exceptional reasons for considering commencement of employment prior to receiving clearance?~~**

~~This should not be a natural default position, and should be exceptional and clearly linked to the circumstances identified in response to Question 2 below.~~

- 2 **~~What would be the consequences to the School's operations of waiting until clearance is received?~~**

~~These should be exceptional and have a demonstrable substantial impact. The School should be able to demonstrate how it has used effective planning to avoid / minimise this disruption, and clearly show where this has been unavoidable.~~

- 3 **~~Is the employee known to the school?~~**

~~A former employee, who would have had a DBS check when working in the School, and of whom a great deal is known, will present a much lesser risk than a new employee, who is not known to at all. The more recent the departure the lower the risk.~~

- 4 **~~If the employee commenced work, what would be their normal level of access to children?~~**

- ~~i. — Unsupervised access one-to-one~~
- ~~ii. — Unsupervised access to a group~~

~~Neither of these would be acceptable arrangements in any circumstances during this “waiting period”.~~

- ~~iii. — Supervised access one-to-one~~
- ~~iv. — Supervised access to a group~~
- ~~v. — No direct access, but based within premises~~

~~In these circumstances, if an employee does commence employment prior to clearance being received, their access must be supervised at all times. The level of risk declines the lower down the list above, but there continues to be a risk with each of these scenarios.~~