



Safer Recruitment Policy

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1. Aims

This policy has been developed to embed safer recruitment practices and procedures throughout Excellence Girls Academy and to support the creation of a safer culture by reinforcing the safeguarding and well-being of children and young people in our care.

This policy is an essential element in creating and maintaining a safe and supportive environment for all pupils, staff and others within the school community and aims to ensure both safe and fair recruitment and selection of all staff and volunteers by:

- Attracting the best possible candidates/volunteers to vacancies based on their merits, abilities and suitability to the position and are considered equitably and consistently;
- Deterring prospective candidates/volunteers who are unsuitable from applying for vacancies;
- Identifying and rejecting those candidates/volunteers who are unsuitable to work with children and young people.

This policy complies with guidance outlined in '[Keeping Children Safe in Education](#)' (DfE,2020) and local procedures [outlined by Stoke-on-Trent and Staffordshire Safeguarding Children Board](#).

It also reinforces the procedures outlined in the school's Child Protection and Safeguarding Policy and Whistleblowing Policy which all staff are expected to be familiar with. All successful candidates for paid or voluntary employment are made aware of these documents.

Our safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. We also undertake interviews and, carry out DBS checks and verify the candidates DBS status, the children's list and right to work in England checks.

2. Definitions

DBS refers to the Disclosure and Barring Service.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

The term **volunteer** is defined in the Police Act 1997 (Criminal Records) Regulations 2002, as 'any individual engaged in an activity which involves spending time, unpaid (except for travel and other approved out of pocket expenses), doing something which aims to benefit some third party and not a close relative.

3. Roles and Responsibilities

The Governing Body will:

- Ensure the school operates 'safer recruitment' procedures and makes sure that all appropriate checks are carried out on all staff and volunteers who work with children; and that any panel involved in the recruitment of staff has at least one member who has undertaken Safer Recruitment Training (Reviewed every 5 years);
- Ensure that a section 128 check required for Independent Schools will be carried out for management positions including Governors/Proprietor;
- Ensure this is in accordance with Department for Education guidance and legal requirements and monitor the school's compliance with them;
- Ensure that all staff are suitably trained in recognising and responding to signs of abuse;
- Ensure that all staff are aware that we do not tolerate extreme religious or political views in any capacity. This includes any views which are prohibited under the law as well as those views that

contravene our ethos and stance on equality, tolerance and respect for all, regardless of Race, Gender, faith, sexual orientation etc.

- Pay due rigour to selection, recruitment, training and development processes to ensure that staff candidates are selected for their aptitude and ability in line with the Equality Act 2010.

The Headteacher will:

- Ensure that the school operates safe and fair recruitment and selection procedures which are regularly reviewed and up-dated to reflect any changes to legislation and statutory guidance;
- Ensure that all appropriate checks have been carried out on staff and volunteers in the school;
- Ensure that all staff are suitably trained in recognising and responding to signs of abuse;
- Ensure that all staff are aware that we do not tolerate extreme religious or political views in any capacity. This includes any views which are prohibited under the law as well as those views that contravene our ethos and stance on equality, tolerance and respect for all, regardless of Race, Gender, faith, sexual orientation etc.
- Monitor any contractors and agencies compliance with this document.
- Promote the safety and well-being of children and young people at every stage of this process.

4. Single Central Register

In line with statutory regulations, the school will maintain an up-to-date Single Central Record (SCR) detailing a range of checks carried out on staff. This document will be kept securely electronically and will cover the following people:

- All staff (including supply staff, and teacher trainees) who work at the school: this means those providing education to children; and
- All members of the proprietor body

The information that will be recorded in respect of all staff members mentioned above is whether the following checks have been carried out or certificates obtained and the date on which each check was completed/certificate obtained.

Where checks are carried out on volunteers, the school will record this on the Single Central Record (SCR).

5. New staff

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

The Headteacher and members of the Senior Leadership Team (SLT) have undertaken Safer Recruitment in Education Training and will be involved in all staff and volunteer appointments and arrangements (including where appropriate, contracted services).

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- 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', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

From our website, prospective applicants will be able to request further information via our email such as the job description/person specification and an application pack.

Our application pack will:

- 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)
- Include a copy of, or link to, our child protection and safeguarding policy and this safer recruitment policy which details the employment of ex-offenders

Prospective applicants must complete, in full, and return a signed application form (electronic signatures are acceptable when an application is submitted electronically). Incomplete application forms will be returned to the applicant where the deadline for completed forms has not passed.

Candidates submitting an application form completed electronically are asked to sign the form if called for interview.

A Curriculum Vitae is not accepted in place of a completed application form.

All applicants are required to complete the following section as part of the application pack:

Rehabilitation of Offenders Act 1974

Under the Rehabilitation of Offenders Act 1974 (exceptions) Order 1975, you are required to declare any information about convictions, past cautions or prosecutions pending. Any offer of employment will be subject to an Enhanced Level DBS check. All disclosures of criminal background are strictly confidential.

Please detail any offence(s) including convictions, in a sealed envelope and attach it with this application form.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Candidates are short listed against the person specification for the post.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

Two references, one of which must be from the applicant's current/most recent employer, are taken up before a candidate is appointed.

References are sought directly from the referee, and where necessary, are contacted to clarify any anomalies or discrepancies. Detailed written records are kept of such exchanges.

Where necessary, previous employers who have not been named as referees may be contacted in order to clarify any such anomalies or discrepancies. Detailed written records are kept of such exchanges.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- 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
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Referees are asked the following specific questions:

- The candidate's suitability to work with children and young people
- Any disciplinary warnings, including time-expired warnings, relating to the safeguarding of children and young people
- The candidate's suitability for the post

Reference requests may also include request for the following information:

- Applicants current post and salary
- Sickness record
- Attendance record
- Disciplinary record

Interview and selection

All vacancies require an interview of short-listed candidates.

Candidates called to interview receive:

- A letter confirming the interview and any other selection techniques
- Details of the interview day including details of the panel members
- Details of any tasks to be undertaken as part of the interview process
- The opportunity to discuss the process prior to the interview

All applicants who are invited to an interview are required to bring evidence of their identity, address and qualifications. Only original documents are accepted and photocopies will be taken. Unsuccessful applicant documents will be destroyed following at the end of the recruitment programme.

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made
- Explain satisfactorily any anomalies or discrepancies in the information available to the panel;
- Declare any information that is likely to appear on the DBS disclosure;

- To disclose any convictions, cautions, court orders, reprimands and warnings that may affect their suitability to work with children (whether received before or during their employment at the setting);
- Demonstrate their ability to safeguard and protect the welfare of children and young people.

Applicants will be made aware that all appointments are subject to satisfactory references, vetting procedures and DBS clearance.

Pre-appointment Checks

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.

We 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. We follow requirements and best practice in retaining copies of these checks, as set out below.

When appointing new staff, we will:

- Verify their identity - preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available, three forms of ID will be required
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken (See Appendix 1 for our policy on how we handle DBS certificates in accordance with the DBS Code of Practice and Data Protection Law)
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate
- Verify their mental and physical fitness to carry out their work responsibilities - The job applicant will answer relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website;
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK (Note: From 01 January 2021 the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in European Economic Area (EEA) member states – paragraph 172 in KCSiE 2020 gives advice on how to check the past conduct of individuals who have lived or worked overseas following the UK's withdrawal from the European Union).
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state (* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers)
- Ask for written information about previous employment history and check that information is not contradictory or incomplete.
- Seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Disclosure Barring Service Checks and Vetting

For all appointments, an enhanced DBS certificate, which includes barred list information, is required as staff will be engaging in regulated activity.

A person will be considered to be engaging in regulated activity if it includes:

- a) Teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children;

- b) Work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers;

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:

- c) Relevant personal care, or health care provided by or provided under the supervision of a health care professional:
 - o Personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing;
 - o Health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

The Safeguarding Vulnerable Groups Act 2006 provides that the type of work referred to at (a) or (b) will be regulated activity if "it is carried out frequently by the same person" or if "the period condition is satisfied".

"Frequently" is not defined in the Act, but the Guidance 'Regulated Activity in relation to Children: scope' describes "frequently" as doing something once a week or more. Paragraph 10 of Schedule 4 to this Act says "the period condition is satisfied" if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving a vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

The level of DBS check required, and whether a Prohibition check is required, will depend on the role and duties of an applicant to work in the school.

For most appointments, an enhanced DBS certificate, which includes barred list information, will be required as the majority of staff will be engaging in regulated activity. A person will be considered to be engaging in regulated activity if as a result of their work they:

Teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children;

Work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers;

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:

Relevant personal care, or health care provided by or provided under the supervision of a health care professional:

Personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing

Health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Volunteers may have enhanced checks, but not barred list checks.

The level of checks required on a volunteer is dependent on the type of duties they will be performing, for example a supervised volunteer is not considered to be undertaking a regulated activity but the school may require an enhanced DBS check only.

Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity with a child.

Portability of Certificates using the DBS Update Service

In order for a DBS check to be carried and used for more than one employer or workplace, an applicant firstly needs to have a new DBS Certificate. The applicant must, within 19 days, register with the DBS for the Update Service after the certificate issue date. It is only when a successful registration has occurred with the update service that a DBS is portable. This allows employers to check a certificate status at any time.

Before using the update service, the school shall:

- Obtain consent from the applicant to do so;
- Confirm the certificate matches the individual's identity;

- Examine the original certificate to ensure that it is for the appropriate workforce and level of check, e.g. enhanced certificate/enhanced including barred list information and the position applied for states 'child workforce'.

We ensure that:

- An enhanced DBS check with a barred list information is carried out for all new appointments who will be engaging in regulated activity;
- A prohibition check through the National College for Teaching and Leadership (NCTL) is carried out to ensure that there is no Prohibition Order made by the Secretary of State against the individual.

Previously Issued DBS Certificates

If a new starter joins Excellence Girls Academy who has previously had a DBS certificate issued then we may, at our discretion, accept it providing the following conditions are met:

- The person has transferred from similar position without a break in service of more than three months
- There is no expiry date on the certificate
- The authenticity of the original DBS certificate is verified
- We obtain written notification from the previous employer that they carried out the checks on the individual who will be working at the school
- Checks are also carried out on that the person presenting themselves for work is the same person on whom the checks have been made. Any information disclosed as part of the DBS check will be treated confidentially - Please see Appendix 1 for our policy on how we handle DBS certificates in accordance with the DBS Code of Practice and Data Protection Law.

Please note a barred list check will be undertaken even if the school decides not to undertake an enhanced DBS check with a barred list check.

Overseas Checks

All new appointments to our school workforce who have lived outside the UK are subject to additional checks as appropriate.

These could include, where available:

- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

Recruitment of Ex-Offenders

All school-based jobs are exempt from the Rehabilitation of Offenders Act 1974 as the work brings employees into contact with children who are regarded by the Act as a vulnerable group. Applicants for school-based jobs must, therefore, disclose all spent and unspent convictions.

We encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process.

We request that this information is sent under separate, confidential cover, to the school to ensure that this information will only be seen by those who need to see it as part of the recruitment process.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position.

Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

Any matters revealed in Disclosure information will be discussed with the person seeking the position before any withdrawal of an offer of employment.

Excellence Girls Academy complies fully with the DBS Code of Practice - to treat all applicants for positions fairly and to not discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed. Having a criminal record will not necessarily bar you from working with us. This will depend on the nature of the position and the circumstances and background of your offences.

On receipt of the DBS which may reveal a conviction or other information, the School shall consider the following factors:

- Whether the conviction or other information disclosed is relevant to the position in question.
- The seriousness of the offence or other matter revealed.
- The length of time since the offence or other matter occurred.
- Whether the applicant has a pattern of offending behaviour or other relevant matters.
- Whether the applicant's circumstances have changed since the offending behaviour or the other relevant matters.
- The circumstances surrounding the offence or incident and the explanation(s) offered by the convicted person.

At Excellence Girls Academy, we ensure that all those who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act.

Other Checks

As a responsible employer, we ensure that those we employ are able to carry out the duties of the post applied for. Therefore, we request all prospective employees to complete a health questionnaire once an offer of employment has been made. We request that the questionnaire is completed to the best of the employee's ability because we will rely on the responses given, in both making the decision to recruit and allowing them to continue in the role.

If necessary, we will seek further medical advice, with the written consent of the prospective employee.

This also applies to those who seek to work for us either as supply staff or volunteers.

6. Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

7. Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. This includes, as necessary, a barred list check, prior to appointing that individual. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

8. Peripatetic Staff

Excellence Girls Academy requires that all necessary checks and DBS checks have been satisfactorily completed for peripatetic staff.

9. Contractors

We 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:

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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

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

We will check the identity of all contractors and their staff on arrival at the school.

10. Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out. As trainee teachers can undertake regulated activity, sometimes unsupervised, an enhanced DBS certificate and barred list is obtained.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

11. Volunteers

The level of checks required on a volunteer is dependent on the type of duties they will be performing, for example a supervised volunteer is not considered to be undertaking a regulated activity but the school may require an enhanced DBS check only.

If they are unsupervised then they will be considered to be undertaking a regulated activity and therefore will require an enhanced DBS check with a barred list check. A DBS check on a volunteer is free if the conditions below are met.

A volunteer must not:

- Receive payment (except for travel or other approved out of pocket expenses)
- Be on a work placement
- Be on a course that requires them to do this job role
- Be in a trainee post that will lead to a full-time role/qualification.

If a volunteer moves from a voluntary position into a paid position that requires a DBS check, then another DBS check will be required and cost incurred.

Under no circumstances a volunteer in respect of whom no checks have been obtained is left unsupervised or allowed to work in regulated activity.

In summary, we will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

12. Governors

All governors will have an enhanced DBS check without barred list information.

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

The chair of the proprietors will have their DBS check countersigned by the secretary of state.

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

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

13. Staff working in alternative provision settings

Excellence Girls Academy is committed to safeguarding our children even if they are placed in alternative provision for a period of time within the school day/week.

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

We would also require written reassurance that any alternative provision provider has acceptable safeguarding practices in place including; their response to concerns about a child; safer recruitment processes; attendance and child missing education procedures; and appropriate information sharing procedures.

14. Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

This includes ensuring that placement providers have policies and procedures in place to safeguard pupils.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

15. Checks on School Children Undertaking Work Placements

It is not necessary to obtain a DBS Disclosure for secondary pupils undertaking voluntary work or work experience. However, as good practice we ensure they sign in and out and are not left unsupervised with children.

16. Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Where children from overseas are staying with UK parents as part of an exchange organised by the school, those parents will be deemed to be in 'Regulated Activity' for the duration of the stay and as such will be required to submit an enhanced DBS check including barring check. As a volunteer, all checks will be processed free of charge by the DBS. Where additional people in the host family are aged over 16 (i.e. elder

siblings) the school will consider on a case by case risk assessment basis whether such checks are necessary.

17. Monitoring arrangements

This document will be reviewed every year but may be reviewed and updated more frequently if necessary.

It will be reviewed by the Governing Body and approved by the Chair of Governors at every review.

18. Links with other policies

This policy should be read in conjunction with the School's:

- Child protection and Safeguarding Policy
- Data Protection Policy
- Equality and Diversity Policy
- Privacy Notice for Applicants
- Supply Staff Policy
- Staff Code of Conduct
- Volunteers Policy

Appendix 1: Handling of DBS certificate information

This guidance has been adapted from the [guidance produced by the Disclosure and Barring Service \(DBS\)](#) in regards to the secure storage, handling, use, retention and disposal of DBS certificates and certificate information.

The [code of practice](#) states that all registered bodies must have a written policy on the correct handling and safekeeping of DBS certificate information.

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Excellence Girls Academy complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

Storage and access

DBS Certificate information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Any DBS information stored electronically will be password protected, likewise with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

As an organisation which is inspected by Ofsted, we may be legally entitled to retain the certificate for the purposes of inspection.

In addition, as an organisation that require retention of certificates in order to demonstrate 'safer recruitment' practice for the purpose of safeguarding audits, we may be legally entitled to retain the certificate.

These practices are compliant with the Data Protection Act, Human Rights Act, General Data Protection Regulation (GDPR), and incorporated within the individual organisation's policy on the correct handling and safekeeping of DBS certificate information.

Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints or be for the purpose of completing safeguarding audits.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.