

Safer Recruitment, Selection & Assessment Policy

Introduction

This policy focuses on ensuring potential applicants are given the right messages about our commitment to recruit only suitable people. It is a vital part of our whole school approach to safeguarding and our commitment to creating a culture that safeguards and promotes the welfare of children and young people.

The aim of the policy is to set out and embed robust recruitment procedures that deter and prevent people who are unsuitable to work with children and young people from applying for or securing employment, or volunteering here at Royal School for the Deaf Derby.

Signed	Janet Hall	Designation	Chair of Governors	
	Heather Flockton			
Name	Janet Hall	Date	February 2023	
	Heather Flockton			

Date of last review:	February 2023	Date of next review:	Annually
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Policy review dates and changes

Review date	By whom	Summary of changes made	Date implemented

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Recruitment, selection and assessment process

Royal School for the Deaf Derby is committed to ensuring that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training covering, as a bare minimum, part three of Keeping Children Safe in Education 2023. At least one person who conducts an interview will always have undertaken safer recruitment training.

Advertisements

- 1. each role advertised will be accompanied by a role specification setting set out the following.
 - the skills, abilities, experience, attitude, and behaviours required for the post, and
 - the safeguarding requirements, i.e. to what extent the role involves contact with children and if they be engaging in regulated activity relevant to children.
- 2. All advertisements include:
 - a statement of our commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken
 - the safeguarding responsibilities of the post as per the job description and personal specification, and
 - a warning that online checks may also be undertaken to help identify any
 incidents or issues that have happened, and are publicly available online, which
 the school or college might want to explore with the applicant at interview

Application forms

- 3. Where a role involves engaging in regulated activity relevant to children and young people, a statement in the Instructions to Applicants makes clear it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children and young people.
- 4. The Instructions to Applicants also sign-posts applicants to a copy of the our child protection policy and practices and our policy on employment of ex-offenders available on our website.
- 5. Applicants will be asked to provide:
 - personal details, current and former names, current address and national insurance number
 - details of their present (or last) employment and reason for leaving
 - a full employment history in a dd/mm/yyyy format (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
 - · qualifications, the awarding body and date of the award
 - details of referees/references, and

- a statement of the personal qualities and experience the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.
- 6. A curriculum vitae will not be accepted alone as application for any roles as it will not provide sufficient information.

Shortlisting

- 7. Shortlisted candidates will be asked to complete a self-declaration of their criminal record and other information that would make them unsuitable to work with children. This will include.
 - if they have a criminal history
 - if they are included on the children's barred list
 - if they are prohibited from teaching (for all shortlisted applicants that have QTS)
 - if they are prohibited from taking part in the management of an independent school
 - information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
 - if they are known to the police and children's local authority social care
 - if they have been disqualified from providing childcare (see paras 263-267), and,
 - any relevant overseas information.
- 8. Applicants will be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate will be required to sign a hard copy at interview
- 9. All shortlisted candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received.
- 10. When shortlisting we will:
 - ensure that at least two people carry out the shortlisting exercise and wherever possible also interview to ensure a consistent approach
 - consider any inconsistencies and look for gaps in employment and reasons given for them, and,
 - explore all potential concerns.
- 11. In addition, as part of the shortlisting process we will carry out an online search as part of due diligence checks on all shortlisted candidates. This is to help identify any incidents or issues that have happened, and are publicly available online, which we may want to explore with the applicant at interview.

Employment history and references

- 12. References for applicants will be sought to obtain factual information to support appointment decisions. References will be obtained before interview wherever possible to allow any concerns raised to be explored further with the referee and taken up with the candidate at interview.
- 13. We will:
 - not accept open references e.g. to whom it may concern
 - not rely on applicants to obtain their reference
 - ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference will be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations)
 - obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed
 - secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer
 - always verify any information with the person who provided the reference
 - ensure electronic references originate from a legitimate source
 - contact referees to clarify content where information is vague or insufficient information is provided and remind them of information sharing principles together with their obligations set out in Working Together to Safeguard Children if appropriate
 - compare the information on the application form with that in the reference and take up any discrepancies with the candidate
 - establish the reason for the candidate leaving their current or most recent post, and;
 - ensure any concerns are resolved satisfactorily before appointment is confirmed.
- 14. When asked to provide references, we will ensure the information confirms whether the referee is satisfied with the applicant's suitability to work with children, and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold. We will not ask about or consider information about concerns/allegations which are unsubstantiated, unfounded, false, or malicious. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated or malicious will not be sought or, if given, considered in any reference.

Selection & Assessment

15. A range of selection and assessment activities will be used to identify the most suitable person for the post. Structured questions and an interview "score sheet" will be devised and agreed for use by interviewers.

Questions will include:

- finding out what attracted the candidate to the post being applied for and their motivation for working with children (Warner questions)
- exploring a candidate's skills and asking for examples of experience of working with children which are relevant to the role, and,
- probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.
- 16. All interviews will be used to explore potential areas of concern and to determine the applicant's suitability to work with children. Areas that may be concerning and lead to further probing include:
 - implication that adults and children are equal
 - lack of recognition and/or understanding of the vulnerability of children
 - inappropriate idealisation of children
 - inadequate understanding of appropriate boundaries between adults and children, and;
 - indicators of negative safeguarding behaviours.
- 17. Any information about past disciplinary action or substantiated allegations will be considered in the circumstances of the individual case.
- 18. Pupils/students will be involved in the recruitment process in a meaningful way for example through a supervised tour or pupil panel or observation of work sampling.
- 19. All information considered in decision making is clearly recorded along with decisions made.

Pre-appointment vetting checks, regulated activity and recording information

- 20. Pre-appointment vetting checks will be used to help identify if a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). These checks are part of our wider whole school safeguarding regime, which will continue following appointment.
- 21. All offers of appointment will be made subject to satisfactory completion of mandatory pre-employment checks. We will:
 - verify a candidate's identity to be certain that the person is who they claim to be and be

- mindful of the potential for individuals to change their name. As a matter of best practice we will check a candidate's name on their birth certificate, where this is available and follow identification checking guidelines issued by HM Government
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children). When using the DBS update service we will obtain the original physical certificate
- obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities.
 This may include asking a job applicant relevant questions about any disability and their health in order to establish whether they have the physical and mental capacity for the role applied for
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty
 about whether an individual needs permission to work in the UK, then we will follow
 advice on the GOV.UK website
- if the person has lived or worked outside the UK, make any further checks we consider necessary for example, a Police Good Conduct Certificate for an applicant that has lived in Germany
- verify professional qualifications, as appropriate. This could be using the Teaching Regulation Agency's (TRA) Employer Access Service to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.

In addition:

- We will check that a person taking up a management position as described at paragraph is not subject to a section 128 direction made by the Secretary of State
- Ensure that an applicant to be employed to carry out teaching work is not subject to a
 prohibition order issued by the Secretary of State for prohibition checks or any sanction
 or restriction imposed (that remains current) by the GTCE before its abolition in March
 2012
- before employing a person to carry out teaching work in relation to children, we will take
 reasonable steps to establish whether that person is subject to a prohibition order issued
 by the Secretary of State
- Ensure appropriate checks are carried out to ensure that individuals employed to work in reception classes are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

Applicants moving from previous post

22. There is no requirement to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, during a period which ended not more than three months before the person's appointment, the applicant has worked, in a school in England, in a post:

- which brought the person regularly into contact with children, or
- to which the person was appointed on or after 12th May 2006 and which did not bring the person regularly into contact with children or young persons, or
- in another institution within the further education sector in England, or in a 16-19 academy, in a post which involved the provision of education which brought the person regularly into contact with children or young persons.

However we will carry out a check as a matter of best practice.

Note on Regulated activity

- 23. In summary, a person will be engaging in regulated activity with children if, as a result of their work, they:
 - will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children
 - will be working on a regular basis in a specified establishment, such as a school, or in connection with the purposes of the establishment, where the work gives opportunity for contact with children, or
 - engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Regulated activity includes:

- a. teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational 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 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:
 - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness of disability;
 - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

- paid work in specified places which is occasional and temporary and does not involve teaching, training; and
- supervised activity which is paid in non-specified settings such as youth clubs, sports clubs etc.

DBS Checks

- 24. Most roles at Royal School for the Deaf Derby are a Regulated Activity and an enhanced DBS Check with a children's (adults if appropriate) barred list check will be sought Where a Section 128 check is required this will be clearly requested and indicated on the application for the disclosure.
- 25. For all other staff (e.g. contractors) who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check will be sought.
- 26. Barred list information will not be requested on any person who is not engaging in or seeking to engage in regulated activity.
- 27. Where a DBS certificate is required, it will be obtained from the candidate before the person's appointment including when using the DBS update service
- 28. All applicants will be required to show their original paper DBS certificate before they take up post. We will compare any information disclosed on the certificate with any information shared by the applicant during the recruitment process. The integrity of a DBS certificate will be checked in line with government guidance
- 29. We will assess cases fairly, on an individual basis. A decision not to appoint somebody because of their conviction(s) will always be clearly documented to aid any challenge or appeal under policy on the recruitment of ex-offenders.
- 30. When assessing any disclosure information on a DBS certificate, we will take into consideration the explanation from the applicant, including for example:
 - the seriousness of any offence and relevance to the post applied for
 - how long ago the offence occurred
 - whether it was a one-off incident or a history of incidents
 - the circumstances around the incident, and,
 - whether the individual accepted responsibility for their actions.
- 31. We will consider any incidents in the context of the <u>Teachers' standards</u> and <u>Teacher</u> <u>misconduct guidance</u>, if the applicant is applying for ateaching post.
- 32. An individual will only be allowed to start work in regulated activity relating to children before the DBS certificate is available if a risk assessment indicates it is safe. The assessment will include, amongst other things, appropriate supervision and if all other checks, including a separate **children's barred list check are complete. In any event a** barred list check will only

be carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 232 have been carried out), or
- where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph 232 have been carried out).

Use of the DBS Update Service

- 33. Individuals can join the DBS Update Service at the point that an application for a new DBS check is made. Subscription to the service enables future status checks to be carried out by employers to confirm that no new information has been added to the checksince its issue.
- 34. Before using the Update Service we will:
 - obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check
 - confirm the DBS certificate matches the individual's identity
 - examine the original certificate to ensure that it is valid for employment with the children's workforce, and,
 - ensure that the level of the check is appropriate to the job they are applying for,
 e.g. enhanced DBS check/enhanced DBS check including with barred list information.

Prohibitions, directions, sanctions and restrictions

Secretary of State teacher prohibition, and interim prohibition orders

- 35. As a matter of course all candidates appointed to a teaching role and those who are not applying for a teaching role but have qualified teacher status will be checked to make sure they are not prohibited from teaching
- 36. A person who is prohibited will be appointed to a role that involves teaching work (as defined in the Teachers' Disciplinary (England) Regulations 2012)
- 37. There are a number of individuals who are still subject to disciplinary sanctions, which were imposed by the GTCE (prior to its abolition in 2012). Checks will be made using the TRA Secure Access system where GTCE checks can be made.

Secretary of State section 128 directions

- 38. A section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent school, including academies and freeschools. An individual who is subject to a section 128 direction is unable to:
 - take up a management position in an independent school, academy, or in a freeschool as an employee
 - be a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school, or
 - be a governor on any governing body in an independent school, academy or free school school that retains or has been delegated any management responsibilities.
- 39. There is no exhaustive list of roles that might be regarded as 'management' for the purpose of determining what constitutes management in an independent school. However roles involving, or very likely to involve, management of a school include (but are not limited to) headteachers, principals, deputy/assistant headteachers, governors and trustees. In determining whether other individuals such as teachers with additional responsibilities could be considered to be 'taking part in management' we will consider the content of the role as the determining factor not the job title.
- 40. A section 128 direction will be disclosed when an enhanced DBS check with children's barred list information is requested, provided that 'child workforce independentschools' is specified on the application form as the position applied for. Where a person is not eligible for a children's barred list check but will be working in a management position in an independent school, a section 128 check should be carried out using the TRA's Employer Access service.

Childcare disqualification

- 41. Childcare disqualification is an additional requirement to the general child safeguarding arrangements provided under the Disclosure and Barring Service (DBS) regime, which applies to all children.
- 42. The childcare disqualification arrangements apply to staff working with young children in childcare settings, including primary schools, nurseries and other registered settings such as childcare provision on educational premises..
- 43. The arrangements predominantly apply to individuals working with children aged 5 and under, including reception classes, but also apply to those working in wraparound care for children up to the age of 8, such as breakfast clubs and after school care.
- 44. For staff who work in childcare provision, or who are directly concerned with the management of such provision, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations 2018.

Evidencing and recording safer recruitment information

Single central record

- 45. We maintain a single central record of pre-appointment checks for the following people
 - all staff, including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day
 - all members of the proprietor body.
 - Regular contactors and those who we have undertaken an enhanced criminal record check
 - Trustees
- 46. The single central record evidences checks for staff members (including teacher trainees on salaried routes) is set out below. For agency and third- party supply staff, we record whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.
- 47. The single central record indicates whether the following checks have been carried out or certificates obtained, and the date on which each check was completed orcertificate obtained:
 - · an identity check
 - a stand alone children's barred list check
 - an enhanced DBS check (with children's barred list check) requested/certificate provided
 - a prohibition from teaching check
 - further checks on people who have lived or worked outside the UK
 - a check of professional qualifications, where required, and,
 - a check to establish the person's right to work in the United Kingdom.

In addition:

- We record details of the section 128 checks undertaken for those in management positions.
- 48. The details of an individual are removed from the single central record once they no longer work at the school

Non statutory information

- 49. We record any other information we deem relevant for example:
 - whether relevant staff have been informed of their duty to disclose relevant information under the childcare disqualification arrangements

- checks made on volunteers
- checks made on governors
- dates on which safeguarding and safer recruitment training was undertaken, and;
- the name of the person who carried out each check.

Retention of documents

- 50. We do not keep copies of DBS certificates
- 51. We do keep a copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications on their personnel file.

Other checks that may be necessary for staff, volunteers, the chair of governors, the governing body and others

Individuals who have lived or worked outside the UK

52. Individuals who have lived or worked outside the UK will undergo the same checks as all other staff. This includes obtaining (via the applicant) an enhanced DBS certificate (including children's barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, we will make any further checks we think appropriate. We apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

These checks will include, where available:

- criminal records checks for overseas applicants for teaching positions
- obtaining a letter (via the applicant) from the professional regulating authority (this is
 often the Department/Ministry of Education but varies across the world) in the country
 (or countries) in which the applicant has worked confirming that they have not
 imposed any sanctions or restrictions, and or that they are aware of any reason why
 they may be unsuitable to teach.
- 53. Where available, such evidence will be considered together with information obtained through other pre-appointment checks to help assess their suitability.
- 54. Where this information is not available we 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.
- 55. Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, we will consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment in line with DfE guidance
- 56. Although not all countries provide criminal record information, and where they do, the nature and detail of the information provided varies from country to country we will be mindful

that the criteria for disclosing offences in other countriesoften have a different threshold than those in the UK and pay due regard to Home Office provides guidance on criminal records checks for overseas applicants.

57. We encourage all candidates who apply for teaching roles and are overseas qualified teachers to apply to the TRA for the award of qualified teacher status (QTS) in England. We will also be mindful that where applicants hold a teaching qualification (wherever it was obtained) it may not provide suitable assurances for safeguarding purposes that an individual has not been found guilty of any wrongdoing or misconduct, and or is suitable to work with children.

Agency and third-party staff (supply staff)

- 58. When recruiting agency or third party supply staff we will obtain written notification from any agency, or third party organisation, that they have carried out the same checks as we would otherwise perform on any individual who will be working directly for us (or who will be providing education on the school's behalf, including through online delivery). In respect of the enhanced DBS check, we will ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.
- 59. Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work, which has disclosed any matter or information, or any information was provided to the employment business, we will obtain a copy of the certificate from the agency.
- 60. We will always check that the person presenting themselves for work is the same person on whom the checks have been made through insisting on Group 1 evidence such as a passport before they commence their first assignment.

Contractors

- 61. Where we recruit contractors to provide services we will set out our safeguarding requirements in the agreement contract between the provider and the school.
- 62. We will ensure that any contractor, or any employee of thecontractor, who is to work at the school or college, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information).
- 63. For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across several sites. In cases where the contractor does not have opportunity for regular contact with children, we will consider whether a basic DBS disclosure would be appropriate.
- 64. Under no circumstances will a contractor on whom no checks have been obtained be

allowed to work unsupervised or engage in regulated activity relating to children and an appropriate level of supervision will be put in place depending on the circumstances.

- 65. Where an individual working on school premises is self-employed, we will consider obtaining a DBS check on their behalf as self-employed people are not able to make an application directly to the DBS on their own account.
- 66. We will always check the identity of contractors on arrival in line with our visitors policy.

Trainee/student teachers

- 67. Where applicants for initial teacher training are salaried we will ensure that all necessary checks are carried out. If trainee teachers are engaging in regulated activity relating to children (which in most cases by the nature of the work, they will be), an enhanced DBS check (including children's barred list information) will be obtained.
- 68. Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. We will obtain written confirmation from the provider that it has carried out all pre-appointment checks that we would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children.
- 69. Although there is no requirement to record details of fee-funded trainees on the single central record we will record relevant information under non statutory information available on our online SCR App.

Volunteers

- 70. Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.
- 71. We recognise that volunteers play an important role and are often seen by children as being safe and trustworthy adults and the nature of voluntary roles varies. Most volunteer roles here at Royal School for the Deaf Derby involve working directly with children and young people therefore the same recruitment, selection, assessment and vetting checks are undertaken for volunteers. In line with Statutory guidance Regulated activity (children) Supervision of activity with children which is regulated activity when unsupervised we opt for volunteering roles with children to be working in a regulated activity due to the vulnerability of children and young people.
- 72. We will always obtain an enhanced DBS check (including a children's barred list information) for all volunteers who are new to working in regulated activity with children, i.e. where they are supervised or unsupervised and teach or look after children regularly or provide personal care on a one-off

Supervision of volunteers

- 73. In determining whether or not a volunteer is considered to be supervised and to what level we will pay due regard to statutory guidance issued by the Secretary of State
- 74. For a person to be considered supervised, the supervision will be:

- by a person who is in regulated activity relating to children ¹⁰⁵
- regular and day to day, and
- reasonable in all the circumstances to ensure the protection of children.

In any event, all volunteers are likely to be deemed to be working in a Regulated Activity and subject to the same safer recruitment checks as paid members of staff working in a regulated Activity.

Existing volunteers

75. Volunteers will be re-checked if they have already had a DBS check and participate in the school's rolling programme of checks to ensure all staff are suitable to work with vulnerable children and young people.

School governors

- 76. The Governors are the proprietors of non-maintained special schools therefore, in line with the Non Maintained Special School Regulations 2015 (as amended) and accompanying guidance, before an individual becomes the Chair of the Governing Body the Secretary of State will:
 - carry out an enhanced DBS check; and where such a check is made, obtain an enhanced DBS certificate (either including or not including children's barred list information as appropriate)¹
 - confirm the individual's identity, and
 - if the individual lives or has lived outside of the UK, where applying for an enhanced check is insufficient, such other checks as the Secretary of State considers appropriate
- 77. The chair will also ensure that other members are not subject to a section 128 direction that would prevent them from taking part in the management of an independent school (including academies and free schools).
- 78. Further checks, as the chair considers appropriate, will be undertaken where,by reason of the individual's living or having lived overseas, obtaining an enhanced DBS check is not sufficient to establish an individual's suitability to work in our school.
- 79. All Governors are required to have an enhanced DBS check. It is the responsibility of the governing body to apply for the certificate for any governors who do not already have one.
- 80. Governance is not a regulated activity relating to children, so governors do not need a children's barred list check unless, in addition to their governance duties, they also engage in regulated activity.
- 81. A section 128 check for school governors is necessary and undertaken because a person prevented from participating in the management of a non maintained special school by a section 128 direction is also disqualified from being a governor. There is no requirement to record this information on the single central record however we chose to so we can provide evidence alongside other checks

End Note & Overlapping Policies

We recognise safe recruitment is not just about carrying out the right DBS checks. Similarly that safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from governing bodies and all staff to ensure the safety and welfare of children is embedded in all of our processes and procedures, and consequentially enshrined in its ethos. Other policies and documents that should be read in conjunction with this policy are:

- Child Protection
- Code of Conduct
- Whistleblowing