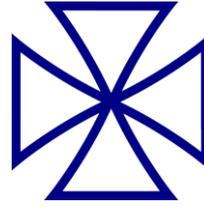




St Paul's School



Colet Court

SAFEGUARDING CHILDREN POLICY

This policy is available on the Intranet and School website.

ENHANCED DISCLOSURE AND BARRING SERVICE CHECK

Due to the nature of the School's work, it applies for an enhanced disclosure from the Disclosure and Barring Service (DBS), in respect of all people appointed to positions at the School. The enhanced disclosure process reveals every criminal conviction (including spent convictions) and any further information which the Chief Officer of Police considers relevant. This includes whether an individual is barred from working with children or vulnerable adults by virtue of his/her inclusion on the lists of those considered unsuitable to work with children, maintained by the Independent Safeguarding Authority. The School pays for the cost of the disclosure and the appointed person receives a copy of the disclosure certificate. Enclosed are the School's Policy Statements on *The Recruitment of Ex-Offenders*, *The Secure Storage, Handling, Use, Retention & Disposal of Disclosure Information* and *The Portability of Disclosures*.

Part of the disclosure process requires the School to follow the DBS guidance (reviewed 28/05/2012) and to satisfy itself about the identity of the "appointed person". The applicant must provide specific identification documents as part of the DBS application process:

Group 1 Primary Trusted Identity Credentials: Current valid passport – UK or EEA (or Non-EEA in combination with a Biometric Residence Permit or Current Work Permit/Visa)

- Biometric Residence Permit (UK)
- Current Driving Licence (UK) (Full or provisional), Isle of Man/Channel Islands; Photo card only (a photo card is only valid if the individual presents it with the associated counterpart licence; except Jersey)
- Birth Certificate (UK & Channel Islands) – issued within 12 months of birth; Full or short form acceptable including those issued by UK authorities overseas, such as Embassies, High Commissions and HM forces

Group 2a – Trusted Government/State Issued Documents

- Current valid Passport (UK, EEA or Non-EEA)
- Current UK Driving licence (Photo card or old style paper version)
- Biometric Residence Permit (UK)
- Birth Certificate (UK & Channel Islands) – issued within 12 months of date of birth
- Certified copy of Birth Certificate (UK and Channel Islands) – issued after 12 months of date of birth
- Marriage/Civil Partnership Certificate (UK)
- Adoption Certificate (UK)
- HM Forces IS Card (UK)
- Fire Arms Licence (UK)

Group 2b – Financial/Social History Documents

- Mortgage Statement (UK) **
- Bank/Building Society Statement (UK)*
- Credit Card Statement*
- Financial Statement – e.g. pension, endowment, ISA (UK) **
- P45/P60 Statement (UK & Channel Islands)**
- Council Tax Statement (UK & Channel Islands) **
- Work Permit/Visa (UK) (UK Residence Permit)**
- Utility Bill (UK)* - Not Mobile Telephone
- Benefit Statement* - e.g. Child Allowance, Pension
- A document from Central/Local Government/Government Agency/Local Authority giving entitlement (UK & Channel Islands)* - e.g. from the Department for Work and Pensions, the Employment Service, Customs & Revenue, Job Centre Plus, Social Security
- EU National ID Card
- Card carrying the PASS accreditation logo (UK)

Please note:

If a document in the List of Valid Identity Documents is:

- **Denoted with *** - it should be less than three months old
- **Denoted with **** - it should be issued within the past 12 months
- **Not denoted** - it can be more than 12 months old

There are three routes for the ID checking process including a new external ID validation check which includes reporting to the police for fingerprinting if an individual is unable to provide the required documentation. The School will be able to provide further guidance on this process should it be necessary.

The applicant will also need to provide details of all names by they have been known and all addresses where they have lived in the last five years.

When an applicant is called to interview they will be requested to provide a selection of documents from the above groups.

If an application is not successful any photocopies held will be immediately destroyed. Information on the “appointed person” obtained through this process will be stored securely [in locked, non-portable storage containers (access to which will be restricted to those who are entitled to see it as part of their duties)] for a maximum period of 6 months. It will be securely destroyed thereafter, by suitable means such as shredding.

Please see the School's policy statement on the secure storage, handling, use, retention and disposal of disclosures and disclosure information, for further detail.

Information about the disclosure process can be found on www.homeoffice.gov.uk, together with the DBS's Code of Practice.

POLICY STATEMENT ON THE RECRUITMENT OF EX-OFFENDERS

- As an organisation using the DBS Disclosure service to assess applicants' suitability for all positions at the School, the School complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly.
- The School shall not unfairly discriminate against any subject of a Disclosure on the basis of conviction or other information revealed and appointments shall be made on the basis of merit and ability. The School welcomes applications from a wide range of candidates and actively promotes equality of opportunity for all with the right mix of talent, skills and potential.
- As a school with children we request an enhanced DBS Disclosure on all candidates who have been offered employment. All application forms and job descriptions contain a statement that a DBS Disclosure will be requested in the event of the individual being offered the position.
- All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions, including those which would normally be considered "spent", when applying for a position at the School. A failure to disclose a previous conviction may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.
- It is unlawful for the School to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to attempt to apply for a position at the School. The School will make a report to the Police and / or the ISA if:
 - it receives an application from a barred person;
 - it is provided with false information in, or in support of an applicant's application; or
 - it has serious concerns about an applicant's suitability to work with children.
- We ensure that all those in the School 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 1974.
- 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.
- Further information on the DBS can be found on www.homeoffice.gov.uk
- We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

If an applicant has a criminal record, this will not necessarily bar him / her from working within the School. This will depend on the nature of the position and the circumstances and background of the offences and each case will be decided on its merits and in accordance with the following objective assessment criteria:

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any 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 other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

It is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:

- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence or

serious class A drug related offences, robbery, burglary, theft, deception or fraud.

This written policy on the recruitment of ex-offenders is made available to all Disclosure applicants at the outset of the recruitment process.

POLICY STATEMENT ON THE SECURE STORAGE, HANDLING, USE, RETENTION & DISPOSAL OF DISCLOSURES & DISCLOSURE INFORMATION

General Principles

As an organisation using the DBS Disclosure service to help assess the suitability of applicants for all positions, the School complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

Storage and Access

Disclosure information is never kept on an applicant's personnel file and is always kept separately and 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.

Handling

In accordance with section 124 of the Police Act 1997, Disclosure 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 Disclosures or Disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure 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 Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately, suitably destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (eg waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

POLICY STATEMENT ON THE PORTABILITY OF DISCLOSURES

The DBS 's guidance states:

“There may be instances when a Disclosure issued for one position could be used for another job or voluntary position. This guidance is intended to help recruiters and individuals decide when a Disclosure can be used for more than one position”.

However, it goes on to warn that:

“A disclosure of whatever type, carries no period of validity. This is because Disclosures are designed for use immediately after issue. Enhanced Disclosures are designed to be used at the point of recruitment for a particular position only, and will be of most use the closer to the date of issue they are used. Recruiters considering making use of Disclosures issued to other organisations should bear in mind the age of any Disclosure they are considering”.

The School's policy is to require all new staff to obtain a new disclosure irrespective of whether they had a valid disclosure in their previous position.

Former members of staff who rejoin the School's employment also require fresh Disclosures unless the interval between leaving and being re-employed is less than three months.

Authorised by	resolution of the Board of Governors
Date	14 March 2012