



Recruitment Policy

This policy applies to (delete as appropriate):

- I. Both BC senior school and BCPS

If this is an employee policy, please indicate if this applies to (delete as appropriate):

- I. All staff / employees, prospective employees, volunteers including governors

Policy owner:	Gayna Yeandle
Frequency of review:	Annually or as and when DfE regulations are updated
Dates of previous review:	July 2023
Date of current live version:	July 2024
Date of next formal review:	July 2025
BC Policy reference:	B20
ISI reference code (where applicable):	18a
Linked policies/documents:	Safeguarding Policy, Staff Equal Opportunities Policy, Dignity at Work Policy
Key changes to previous version:	Reviewed and no changes made, other than addition of sign-off by senior member of BCPS staff.

	Name (role):	Signature:	Date:
Policy owner:	Gayna Yeandle Head of HR	G Yeandle	3 July 2023
SMT owner (if different):	Emma Dobson (Bursar)	E C Dobson	1 st August 2024
	Gareth Brocklesby Deputy Head (Common Room)	G Brocklesby	16 th August 2024
	Tamsin Hoyles (Senior Deputy Head, BCPS)	T Hoyles	16 th August 2024
Legal Counsel:	Matthew Burgess	Matthew Burgess	22.8.24
Ratified (Governor):	Martina Asmar	M Asmar	2 September 2024

Brighton College Staff Recruitment and Selection Policy

Brighton College is committed to safeguarding and promoting the welfare of children and young people and fostering a culture of safety, equality and protection. We expect all staff, governors and volunteers to share these commitments. Further, the College understands that a robust, fair and transparent recruitment and selection policy is central to achieving these aims.

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

1. General

- 1.1 Brighton College recognises that its staff are fundamental to its success. A strategic and professional approach to recruitment and selection will enable the College to attract and appoint staff with the necessary skills and attributes to fulfil its strategic aims and support the College's values.
- 1.2 The College is committed to ensuring that the recruitment and selection of staff is conducted in a manner that is systematic, efficient, and effective and promotes equality of opportunity.
- 1.3 All checks will be made in advance of appointment (see para 35 below in relation to the procedures to be followed if DBS checks are delayed).
- 1.4 This policy has been produced to provide a flexible framework which promotes good practice, fulfils the College's commitment to promote equality and diversity and supports fully the College's core business whilst ensuring that the College meets all its responsibilities to ensure safer recruitment.
- 1.5 Advice and support is available at all stages of the recruitment process from the HR Department.

2. Scope

- 2.1 This policy applies to the recruitment and selection of all staff to the College regardless of the status of the post.
- 2.2 All Brighton College employees who are involved at any stage in the recruitment and selection of staff must be made aware of and adhere to the contents of this policy. In addition, any external consultants, recruitment agencies or external experts who assist in the recruitment process must act in accordance with this policy.

3. Aims

- To meet the College's operational requirements and strategic aims.
- To ensure that the recruitment processes are fit for purpose.
- To appoint the best person for each position.
- To ensure equality of opportunity for all applicants.
- To carry out safe recruitment and vetting practices (see Safeguarding Policy and Part 3 KCSIE)
- To ensure compliance with the College's Safeguarding Policy, Dignity at Work Policy, Staff Equal Opportunities Policy and relevant employment legislation.
- To promote the College's values.

The Recruitment Procedure

1. Guidance on all stages of recruitment planning is available from the Recruitment team or the Head of HR and in Part 3 of KCSIE.
2. Hiring managers should first decide on the recruitment requirements e.g. is it a straightforward replacement or an opportunity to redefine the post?
3. Candidate brief to be reviewed and approved by the relevant senior management. This will form the basis of the advertisement and the selection process. Interview and closing date for applications to be agreed.
4. Consideration of whether the advertisement is placed in local and/or national press and whether print and/or online.
5. Adverts to contain a reference to the requirement for an enhanced DBS check and the College's commitment to safeguarding.
6. Applicants directed to Careers Opportunities portal (iRecruit). First time applicants must set up an account through which this and any future applications may be submitted.
7. All offers of employment are subject to the right to work in the UK being evidenced.
8. Adverts are placed on the College website and relevant job board websites.
9. Applications are received via iRecruit. The use of CVs alone is not allowed for reasons of consistency and clarity of employment history; a standard application form enables the College to identify any gaps in employment history.
10. Criteria based on the person specification contained within the Candidate Brief are applied to select candidates for interview. The Chair of the selection panel, guided by HR, will set out a suitable interview programme and timetable. The DfE recommends two or ideally three interviewers (one to observe and take notes). At least one member of the selection panel is to be appropriately trained in line with safeguarding guidance. The College uses the NSPCC training module as the basis for safer recruitment training, and this is followed by College-based workshop sessions.
11. If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare this as soon as they are aware of the individual's application. In this event, it would normally be necessary for the member of staff to avoid any involvement in the selection process.
12. The selection panel should consider and select candidates for interview based on criteria set out in the Candidate Brief. Application forms are checked to ensure that a full employment history is provided, or gaps noted for subsequent investigation.
13. Shortlisted candidates are invited to interview.

The interviewee should be asked to bring the following with them:

- Qualifications
- Three forms of identification from a list provided of Valid Identity Documents, to establish the true identity of the applicant through the examination of a range of documents as set out by the regulators. Applicants must always provide their birth certificate as one form of identity unless there is a good reason why this cannot be provided. We require that these documents confirm the applicant's current residential abode.
- Where an interviewee claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change. They will also be required to provide their birth certificate.

14. The College will seek references for shortlisted candidates (including internal applicants) and may approach previous employers for information to verify particular experience or qualifications before interview.
15. Written references from the two most recent employers should be applied for, one of which must be the current employer if the applicant is still working. Reference requests must specifically ask about the candidate's suitability to work with children and reason for leaving (KCSIE).
16. References from friends and family are not acceptable, neither are those supplied via the candidate. It is made clear by way of the application form that any previous employer may be approached for references.
17. Where an applicant has previously and recently worked in a school we will, where practical, request a reference.
18. Referees will be asked about the candidate's disciplinary record and if there have been any child protection concerns.
19. References must always be verified they are from a legitimate source, with any information verified with the person who provided the reference.
20. The HR Recruitment team will carry out online searches via the commonly available search engines and social media sites. HR will only view what is publicly available. Where practicable, such searches will be carried out for all shortlisted candidates. Where this is not possible, searches will be carried out once a conditional offer has been made. Candidates are informed that online searches may be done as part of due diligence checks and will have the opportunity to discuss any issues that arise from online searches.
21. Candidates will be interviewed against the requirements set out in the Candidate Brief.
22. Interview panels will complete the recruitment templates, which include questions on suitability for the particular post and generic questions to assess suitability to work at Brighton College. The interview should include at least one question to test the candidate's attitude to child protection. *The interview templates also include a section on*

Equality, Diversity and Inclusion; interview panels should seek to check that candidates' attitudes are in line with the College's commitment to EDI.

23. Explanation must be sought if there are any gaps in employment with a written activity timeline record being made to prove that all gaps have been explained and are satisfactory.
24. A written record is required of the outcome of each interview.
25. Shortlisted candidates will be asked to complete a self-declaration of their criminal record and information that would make them unsuitable to work with children. This information will only be requested from shortlisted applicants and not requested on the applicant form. Applicants are required to sign a declaration confirming the information they have provided is true. The self-declaration form will require a physical signature from the applicant.
26. A member of the HR team will either be present at the interview to complete paperwork or collect the interview paperwork, which will contain the interview decision and details of appointment.
27. HR will send the successful candidate a link to the CIPHR Onboarding Platform, where their offer letter and pre-employment documentation will be available. The Onboarding Platform includes a link to the Safeguarding video and the following pre-employment documents:
 - DBS guidance sheet and permission to view DBS certificate form
 - Safeguarding Policy
 - Whistleblowing Policy
 - Information Security Policy
 - Behaviour Policy
 - KCSIE
 - Staff Code of Conduct
 - Confirmation of Medical Fitness declaration
 - Payroll form & HMRC employee's personal details starter form
 - Fire Procedure form
 - For Support Staff: Support Staff Handbook and 'Death in Service' paperwork
 - The College's Privacy Notice relevant to staff, or a hyperlink to the College's webpage where it can be found

Should the appointee have lived/worked outside the UK for more than 3 months in the last 10 years they are to be asked to obtain a certificate of good conduct or equivalent from the country in question. Where the appointee is unable to do this, HR will arrange for the check to be made using a suitable provider. Extra references should be requested for applicants from countries that do not provide criminal record checks. For applicants that have lived or worked outside of the UK, HR will conduct any further checks that they deem appropriate, so that any relevant events that occurred outside the UK can be considered. For applicants in teaching positions, additional checks may include information about their past conduct, for example, documents issued by the relevant teaching regulator abroad. Such evidence can be considered alongside other information obtained through other pre-appointment checks to help assess their suitability. Where available, HR will obtain a letter (via the applicant) from the

professional regulating authority in the country in which the applicant has worked, confirming that they have not imposed any sanctions or restrictions, and/or if they are aware of any reason why they may be unsuitable to teach.

29. HR will ensure that all regulatory pre-appointment checks are carried out for successful job applicants: identity; enhanced disclosure; right to work in the UK; children's barred list (formerly known as List 99); qualifications where needed or specified for the role; overseas checks; medical fitness; employment history; references; prohibition orders (including prohibition from teaching and/or management and prohibition/restriction on teaching imposed by all other countries); childcare disqualification (where relevant). All those who are covered by the disqualification rules set out in the Charities Act 2011 (whereby it is a criminal offence for a person to act as a trustee or senior manager of a charity when disqualified from doing so) are also required to complete a self-declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria.

DfE guidance requires the retention of copies of identity documents, evidence of right to work, and qualifications where relevant to the role.

30. HR will chase references where necessary and validate where appropriate. This must be done by telephoning the person who has provided the reference and taking notes of the exchange. All verbal conversations are recorded as a 'File Note' and this evidence is attached to the Applicant's reference as confirmation of the details provided. Two references must be received and validated before the person starts work.

31. Teaching appointments (to include sports coaches) must be checked against the DfE prohibited list.

32. Prohibition from management. Headteachers, all staff on the senior leadership team (including non-teaching staff), teaching positions with departmental headship, governors and trustees along with proprietors must be checked against the prohibited list as above for s128 directions (which prohibits or restricts a person from taking part in the management of an independent school). The College has regard to the [guidance issued by DfE in July 2021](#) as to who is to be regarded as occupying a management position. Checks are also carried out in relation to internal promotions to management positions. The check is carried out for those in regulated activity via the DBS form to accompany a check which is done via the [DfE Sign-in portal](#). The wording in section 61 of the DBS form, position applied for, must read '*Child Workforce Independent School*'. For those not in regulated activity the check is done via the [DfE Sign-in portal](#).

33. Offer and appointment is subject to successful completion of the relevant probationary period, receipt of a satisfactory DBS disclosure together with suitable references and medical questionnaire return. For teachers, senior support staff and governors, appointment is also subject to satisfactory check against the DfE Prohibited List (including where relevant being barred from management -s128 directions- and prohibition/restriction on teaching imposed by all other countries). In addition, for relevant staff, volunteers and governors who have childcare or management responsibilities for pupils who have yet to attain the age of 8, appointment is subject to receipt of a suitable self-declaration in regards to disqualification (the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of

Charge) (Extended Entitlement) (Amendment) Regulations 2018 which state that it is an offence for a school to employ in connection with early years or later years provision with children up to the age of eight any person who is disqualified).

34. DBS checks. A person will be considered to be engaging in 'regulated activity' if, as a result of their work, they will be responsible, on a regular basis, for teaching, training, instructing, caring for or supervising children; or they will carry out paid, or unpaid, work regularly in College where that work provides an opportunity for contact with children. A more detailed description of regulated activity is provided within KCSIE and also in the [Factual note by HM Government, Regulated activity in relation to children: scope.](#)

Consideration must be given to the level of DBS check to be undertaken but it is recognised that the majority of College staff are in a regulated activity and in these cases an enhanced DBS check (with check against the barred list) should be carried out.

Note: Governors may not meet the criteria for an enhanced Disclosure with check against the barred list.

Please note: there are special arrangements for the DBS check for the proprietor/chair of governors – see ISI guidance.

Anyone over 16 years' old who is a family member of staff (e.g. a spouse) and resident at the College and not on the College roll must be DBS checked at the enhanced level with a barred list (NMS) and reference checked, in addition to completing the 'Agreement between Brighton College and adults who are not employed in a boarding capacity but are living in staff accommodation'.

Any member of staff who, during their time at the College, takes on a role with greater responsibility for pupils e.g. becoming a Housemaster/mistress may be required to undergo a further DBS check. For clarity, anyone taking on a residential boarding role or joining the Safeguarding Team will be required to undergo a further DBS check.

35. The DBS certificate is sent directly to the applicant who must send the original to HR for review.

Details of the DBS disclosure must be recorded in the Central Register: level of disclosure, disclosure number, clearance date, name of the checker and the date the certificate was checked.

If a disclosure is delayed, the candidate may begin work provided that their suitability is checked against the DBS Barred List AND that the DBS application had been made in advance of their start of work and a risk assessment has been completed and that all the other preemployment checks have been completed (identity, right to work in the UK, overseas checks, references, medical declaration and prohibition, qualification and childcare disqualification checks where relevant). In such cases, the candidate must be informed of the appropriate safeguards to be taken; safeguards shall then be enforced and reviewed every two weeks until the DBS check has been approved.

Staff due to work in the boarding houses should not normally commence employment/be redeployed until all relevant checks (including satisfactory DBS disclosures and references) are completed.

Once the job has been offered and accepted, personalised emails should be sent out to those who attended for interview but were not successful. All documentation and explanatory notes relating to unsuccessful applicants, whether interviewed or not, must be held by the HR Department for a maximum period of 6 months in accordance with the College's Retention and Deletion Schedules.

36. New appointments should be announced via email/relevant meetings.
37. Once the employee has completed pre-employment mandatory compliance checks, HR to identify and inform both hiring manager and relevant trained member of staff that Induction Training is to take place on day of joining the College or up to one week before, with confirmation of day one induction answers to be returned to hrcompliance@brightoncollege.net on the same day. HR to book new appointee on the next Safeguarding training slot, inform line managers and new appointee of details via email.
38. HR issues the contract of employment prior to the employee starting, or as soon as practicable after the start date. For Support Staff the relevant job description is attached to the back of their contract.
39. The line manager carries out a departmental induction.
40. The IT department carries out an ICT induction and obtains consent for ICT usage.
41. Where staff are recruited through supply agencies, a check with the agency is to be made that the required checks have been carried out: identity, enhanced disclosure, right to work in the UK, barred list, qualifications, and overseas checks. The single central register must show that all these checks have been carried out and, in addition, that the College has carried out its own identity check. The College must also see the DBS disclosure. The DBS certificate must be no more than three months old unless they have a) worked in a school in the last three months or b) have signed up to the update service and given permission for the College to carry out a check before starting. Additionally, in having regard to KCSIE, the agency should take up references, obtain a declaration of medical fitness, and check previous employment history. In addition, where relevant, that a check for prohibition orders (teachers, senior support staff and coaches) has been carried out and that the self-declaration childcare disqualification form has been completed with no concerns raised. A teacher working for an agency should have a fresh disclosure every three years (or earlier if there are grounds for concern or a break in service of three months or more). Supply agencies must keep 'disclosures' for at least a year and, where an individual remains with an agency for more than 12 months, a disclosure can be kept for up to three years to facilitate portability arrangements. A check of the agency staff member's identity must be made by the College and the DBS disclosure certificate seen.

42. Any contractor who will be working on a regular basis at the college during term time or school holiday periods and who may have unsupervised contact with pupils is subject to an Enhanced DBS check and is required to wear a photographic identification badge. In addition, the contracting company will have agreed to and completed a 'Contractors Agreement' which governs their recruitment strategy. All other contractors who are on site during term time will be accompanied by a member of the Security team or the relevant department.
43. All recruitment is to be undertaken by the HR Department in conjunction with the relevant member of SMT/line manager. All paperwork is to be held centrally by the HR Department. For teaching staff only, a modified file containing CV (if provided), application form, references and appointment letter may be kept by the relevant Head.

Documents relating to applicants will be treated with the utmost confidentiality and in accordance with UK GDPR and the Data Protection Act 2018. Applicants may have the right to access any documentation held about them under data protection legislation, although as noted above under point 35, all documentation and explanatory notes relating to unsuccessful applicants, whether interviewed or not, are held by the HR Department for a maximum period of 6 months in accordance with the College's Retention and Deletion Schedules.

The College is legally required to undertake the above pre-employment checks. Staff and prospective staff will be required to provide certain information to the College to enable the College to carry out the checks that are applicable to their role. The College will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency. Failure to provide requested information may result in the College not being able to meet its employment, safeguarding or legal obligations. The College will process personal information in accordance with its Staff Privacy Notice.

This policy applies to any suitability information obtained about volunteers involved with College activities.

44. Referrals to the DBS, the Teaching Regulation Agency, the Charity Commission and relevant professional bodies.

This policy is primarily concerned with the promotion of safer recruitment and details the preemployment checks that will be undertaken prior to employment being confirmed. Please note that the College also has a legal duty to make a referral to the DBS in circumstances where an individual: -

- has applied for a position at the College despite being barred from working with children; or
- has been removed by the College from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

If the individual referred to the DBS is a teacher, the College may also decide to make a referral to the TRA. For other professionals, a referral to their professional body will be made as required. Where required, the College may also make a serious incident report to the Charity Commission.

Appendix I: Policy on recruitment of ex-offenders

Background

The College will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. The College makes appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar them from employment within the College. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out in paragraph 2 below.

All positions within the College are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered 'spent' except those received for an offence committed in the United Kingdom if has been filtered in accordance with the DBS filtering rules.

A failure to disclose a previous conviction (which should be declared) 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 College 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 apply for a position at the College. The College will make a report to the police and / or the DBS 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.

Assessment criteria

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the College will consider the following factors before reaching a recruitment decision:

- whether the conviction or 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 applicant.

If the post involves regular contact with children, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any of the following offences:

- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or
- any drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving, driving whilst under the influence of drugs, or dangerous driving within the last ten years.

Assessment procedure

It is evident that where relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will carry out a risk assessment by reference to the criteria set out above.

The assessment form must be signed by the Bursar or Director of Operations (for support staff positions), the Head Master (for College teaching positions) or the Head of the Prep School (for teaching positions), before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the College may, where practicable to do so and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Retention and security of disclosure information

The College's policy is to observe the guidance issued or supported by the DBS on use of disclosure information.