



Recruitment, Selection and Disclosures Policy and Procedures

(including recruitment of volunteers and governors, recruitment of ex-offenders policy and recruitment data privacy notice)

Review cycle: Annual

Last Review Date: August 2026

Next Review Date: August 2027

Staff responsible: Bursar

Governor responsible: Main Board

(This policy applies to the whole School including EYFS)
(Willington School reserves the right to update all policies on a regular basis)



RECRUITMENT, SELECTION AND DISCLOSURES POLICY AND PROCEDURES

1. General

Willington Prep School ("the School") is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority.

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

All queries on the School's Application Form and recruitment process must be directed to the Bursar.

An entry will be made on the Single Central Register for all current members of staff at the School, the proprietorial body and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.

Governors

- Faith Pengelly (Co-Chair / Chair of Finance and General Purpose Committee)
- Christopher Bates (Co-Chair)
- Edward Mills
- Kate Hopper-Reeve
- Rhys Tomlinson
- Katy Morgan (Safeguarding Governor)
- Ian White
- Suzanne Le Jeune
- Brian Wagner
- Charmaine Pollock
- Giles Grindlay

Head

- Keith Brown

Bursar

- Colleen Woodley

All checks will be made in advance of appointment or as soon as practicable after appointment with risk assessments in place and with the express permission of the Head for that member of staff to start employment prior to all checks being in place.

2. Scope of this Policy

The Recruitment, Selection and Disclosures Policy and Procedure herewith refers and applies to staff directly recruited and employed by the School. In the Education (Independent Schools Standards) (England) Regulations 2014, staff are defined as:

Any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer.



In the case of agency or contract workers, the School should set out their safeguarding requirements with the organisation and the School and must obtain written confirmation from the agency or company that it has carried out the appropriate safer recruitment checks. The School conducts identity checks on agency and contract workers on arrival in School and, in the case of agency workers (which includes supply staff), they must be provided with a copy of the appropriate level of DBS check for such staff. All agency, contract workers must also complete the school's self-declaration form.

The School will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure – renewed every 3 years, right to work in the UK, barred list, prohibition, qualifications, overseas checks plus, those checks set out in KCSIE as 'pre-employment' checks. The Single Central Register shows these checks have been made and the School carries out its own identity check and has seen a copy of the disclosure (whether or not it discloses any information).

Certain individuals are automatically disqualified from acting in senior management positions within a charity. Whether an individual falls into the category of a senior management position is judged using the following criteria:

- A person who is accountable only to the governors, and who carries overall responsibility for the day-to-day management and control of the charity. At Willington Prep School this would be the Head.
- A person who is accountable only to the Head and/or the governors, and who is responsible for the overall management and control of the charity's finances. At Willington Prep School this would be the Bursar.

Being disqualified means that a person can't take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or 'waived') the disqualification.

In respect of contractors, unchecked contractors will under no circumstances be allowed to work unsupervised in School when children are on site. The School will determine the appropriate level of supervision depending on the circumstances.

Any staff who TUPE transfer into the School's staff will be required to undertake the statutory requirements with regard to safer recruitment checks.

If staff are transferred under TUPE (gap of three months or less and information complete) information will be passed to the new employer and a note made on the Single Central Register that details have been accepted under TUPE.



3. Application Form

The School will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms, but are permitted to be submitted alongside an Application Form.

The School will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. Candidates for employed posts will receive a Job Description and Person Specification for the role applied for.

Checks will be made of previous employment history to ascertain satisfactory reasons for any gaps in employment. These checks will then be checked against references and any discrepancies discussed with the candidate.

The successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service ("DBS") for the position and, where appropriate, a check of the Barred List will be undertaken. Any offer of employment will be conditional on obtaining such satisfactory checks. Additionally, successful applicants should be aware that they are required to notify the school immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration.

The statutory guidance "Disqualification under the Childcare Act 2006" applies to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

The school takes its responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect his/her suitability to work with children must notify the school immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff and/or successful candidates who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Bursar for more details.

The School has a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent duty. Schools are required to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Accordingly, as part of the recruitment process, when an offer is made the offer will be subject to a Prevent duty risk assessment [more guidance for schools from the DfE on this can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf]

If the candidate is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or



disciplinary procedure. Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.

If the candidate is not currently working with children but has done so in the past, the School will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

4. Invitation to Interview

The School will shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. At least two people will carry out the shortlisting exercise, consider any inconsistencies, look for gaps in employment and reasons given for them and explore all potential concerns.

As part of the shortlisting process, the School will consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened, and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

Shortlisted applicants will then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail.

Shortlisted candidates should be asked to complete a self-declaration form in relation to their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. Applicants will be asked to sign a declaration confirming that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

The School will endeavour to obtain references prior to interview. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview. However, if concerns are raised post interview, this must be raised with the candidate either by telephone or inviting the candidate for a follow-up interview.

All formal interviews will have a panel of at least two people chaired by the Head or Bursar or another designated senior member of the SLT. It is recommended best practice that at least one person on the appointment panel will have undertaken safer recruitment training. The Chair of Governors should chair the panel for the Bursar's/Head's appointment. The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Chair as to



whether or not an interviewer should withdraw from the panel. Should the Chair have a conflict of interest, the Vice Chair shall decide whether the Chair should withdraw from the panel.

The interview will be conducted in person and the areas which it will explore will include suitability to work with children including where appropriate, any discussion of information shared by a candidate in their self-declaration form.

All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

The School requests that all candidates invited to interview also bring with them:

1. A current driving licence including a photograph or a passport and a full birth certificate;
2. A utility bill or financial statement issued within the last three months showing the candidate's current name and address;
3. Where appropriate any documentation evidencing a change of name;
4. Where applicable, proof of entitlement to work and reside in the UK.

Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

Candidates with a disability who are invited to interview should inform the School of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

5. Conditional Offer of Appointment: Pre-Appointment Checks

Any offer to a successful candidate will be conditional upon:

1. Receipt of at least two satisfactory references (if these have not already been received); The HR Officer or Bursar will verify the email addresses of the references received. This will be followed up with a telephone call to verify the referee.
2. Verification of identity, address and qualifications including, where appropriate, evidence of the right to work in the UK (if not already received);
3. A satisfactory enhanced DBS check and, if appropriate, a check of the Barred List maintained by the DBS;
4. For a candidate to be employed as a teacher, a check that the candidate is not subject to a prohibition order issued by the Secretary of State or any sanction or restriction imposed (that remains current) by the historic General Teaching Council for England before its abolition in March 2012. Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:
 - Planning and preparing lessons and courses for pupils;
 - Delivering and preparing lessons to pupils;
 - Assessing the development, progress and attainment of pupils; and
 - Reporting on the development, progress and attainment of pupils;
5. Verification of professional qualifications, including Qualified Teacher Status, where appropriate;



6. Verification of successful completion of statutory induction period (for teaching posts – applies to those who obtained QTS after 7 May 1999);
7. *Where the successful candidate has worked or been resident overseas (including EEA teaching candidates):* Such checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing the School with proof of his/her past conduct as a teacher in the form of a letter of professional standing from the professional regulating authority in the country in which s/he 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 suitable to teach;
8. Evidence of satisfactory medical fitness;
9. Confirmation that the candidate is not disqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006 ” or Receipt of a signed Staff Suitability Declaration form showing that the candidate is not disqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006 ”;
10. For a candidate to be employed into a senior management position as set out above under “Scope of this Policy”, receipt of a signed “senior charity manager positions: automatic disqualification declaration” confirming that the candidate is not disqualified from acting in a senior management position for a charity in accordance with the automatic disqualification rules for charities.
11. Where the successful candidate will be taking part in the management of the school, a check will be carried out under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Management Team and teaching heads of department; and

It is the School's practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by the School in strictest confidence and processed in accordance with the Recruitment Privacy Notice and Data Protection Policy. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed workload, extra-curricular activities, and/or layout of the School.

It is our practice that a successful candidate will be required to subscribe to the DBS Update Service as the school undertakes annual status as part of the school's wider safeguarding due diligence

The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

6. References

The School will seek the references referred to in section 5 above for shortlisted candidates (including internal applicants) and may approach previous employers for information to verify particular experience or qualifications, before interview. One of the references must be from the applicant's current or most recent employer. References must be received by a senior person with appropriate authority. If the candidate does not wish the School to take up references in advance of the interview, they should notify the School at the time of applying. The references will be email and telephone verified by either the Bursar or Headmaster, or both.

The School will ask all referees if the candidate is suitable to work with children and to provide facts of any substantiated safeguarding concerns or allegations that meet the harm threshold set out in Part 4 of the



statutory guidance 'Keeping Children Safe in Education'. Substantiated allegations that meet the harm threshold should be included in references. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated, or malicious should not be included in any reference.

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials. The School will verify all references as mentioned above particularly for references received electronically, the School will ensure they originate from a legitimate source.

The School will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.



7. Criminal Records Policy

The School will refer to the Department for Education (“DfE”) document, ‘Keeping Children Safe in Education’ and any amended version in carrying out the necessary DBS checks.

The School complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request, or accessed here:

<https://www.gov.uk/government/publications/dbs-code-of-practice>.

There are limited circumstances where the school will accept a check from another educational institution which are as follows:

This is where the new member of staff (“M”) has worked in: –

- (a) A school or a maintained school in England in a position which brought M regularly into contact with children or young persons;
- (b) A maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or
- (c) An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons,

during a period which ended not more than three months before M’s appointment.

In these circumstances the school may apply for a disclosure but is not required to do so. A new, separate barred list check will be obtained.

DBS Update Service

Where an applicant subscribes to the DBS Update Service the applicant must give consent to the school to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required.

If disclosure is delayed

A short period of work is allowed under controlled conditions, at the Head’s discretion. However, if an ‘enhanced disclosure’ is delayed, a Head may allow the member of staff to commence work:

- Without confirming the appointment;
- After a satisfactory check of the barred list if the person will be working in regulated activity and all other relevant checks (including any appropriate prohibition checks) having been completed satisfactorily;
- Provided that the DBS application has been made in advance;
- With appropriate safeguards taken (for example, loose supervision);
- Safeguards reviewed at least every two weeks by the Head/Bursar and member of staff;



- The person in question is informed what these safeguards are; and
- It is recommended, but is not a requirement, that a note is added to the single central register and evidence kept of the measures put in place.

8. Retention, Security of Records and Data Protection Obligations

The School will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.

The School will comply with its data protection obligations in respect of the processing of criminal records information. More information on this is included in the [Privacy Notice](#) and the [Data Protection Policy](#).

9. Single Central Register

All staff including governors, volunteers, peripatetic teachers and contractors details are held in a central document called the Single Central Register (SCR). On completion of the HR checks, the Headmaster will sign off the HR file once checked against the SCR.

RECRUITMENT OF GOVERNORS AND OTHER VOLUNTEERS

1. GENERAL

Willington School ("the School") is committed to ensuring the best possible environment for the children in its care. Safeguarding and promoting the welfare of children is our highest priority. The School aims to recruit volunteers and governors that share and understand our commitment to the aims of the School. Queries on the School's recruitment process should be directed to the Bursar.

2. RECRUITMENT OF GOVERNORS AND TRUSTEES

As Trustees of a registered charity, the Governors of Willington School are responsible for the selection and appointment of new Governors. This is a legal responsibility that cannot be delegated, although we encourage the Headmaster, Bursar, and other staff or those who are close to the School, such as parents, to suggest the names of potential candidates. The Governors are aware of the importance of identifying the appropriate mixture of skills and experience that we and our successors need to manage the multi-faceted affairs of a modern school which is also a Limited Company, a medium sized business and an important local employer, with some 50 employees.

All Governors complete a selection process, which requires the submission of a CV, an interview with Governors from the Nominations Committee and a meeting with the Headmaster. Every Governor will undertake an enhanced DBS check, barred list check and prohibition from management check. Each appointment is ratified by the full Board. The School arranges for all new Governors to receive a thorough induction in child protection and in the compliance and fiduciary duties of governance. New Governors will visit the School to meet the key personnel, to gain an insight into the curriculum and to meet groups of pupils.

2.1. GOVERNOR'S SELECTION PROCESS

The Initial Stage. When a potential Governor has been identified, who has expressed an interest; he or she will be invited to visit the School, to meet the Headmaster informally and to have a tour of the School. If the Chair of Governors is not present at that stage, s/he will arrange a separate informal meeting, perhaps in the company of another Governor. At that meeting, we will describe our strategic vision for the next 3-5



years and the direction in which the Governors see the School moving. Our aim at the informal meeting is to ensure that the prospective Governor has a clear understanding of the commitment expected of him or her, in terms of time and attendance and is given sufficient material about the School that is in the public domain to allow a well-informed judgement to be made before committing themselves to the appointment process. At the informal meeting, we also brief potential candidates about the range of statutory checks that are required as part of the appointment process.

The appointment process. The second step is to invite the prospective Governor to submit a copy of his/her CV under a covering letter to the Chair of Governors or complete the school's volunteer application form. Following due process, selected candidates will be recommended to the full Governing Body. Care is taken to select Governors who are prepared to serve for a minimum of three, and preferably, five years and to be prepared to commit the time necessary properly to get to know the school. All new appointments are formally recorded in the minutes of the Board, and a formal letter of appointment is sent by the Chair, which specifies the term of the appointment, the total tenure for a Governor, and, if appropriate, the sub-Committee(s) to which the new Governor has been appointed.

Safer Recruitment Checks. The HR Officer or Bursar will obtain the following from the new potential governor before their appointment is confirmed:

- a. An enhanced DBS certificate;
- b. A barred list check and prohibition from management check;
- c. Evidence of their entitlement to work in the UK, where relevant;
- d. Confirmation that they are not disqualified from acting as a Charity Trustee or Company Director, for example by virtue of an undischarged bankruptcy;
- e. A declaration that they are not disqualified from providing childcare under the Childcare (Disqualification) Regulations 2009;
- f. Details of 2 Referees who may be approached to confirm their suitability.

If the new Governor is also to be appointed as a Company Director, a completed Form AP01 (from www.completeformations.co.uk) will be sent to Companies House to register the appointment.

2.2 CHECKS REGARDING THE CHAIR OF GOVERNORS

If the Chair of Governors is to change, the Department for Education obtains an enhanced criminal records check, and checks both the individual's identity and right to work in the UK before he or she takes up the appointment. Further overseas checks are required if the person lives or has lived outside the UK. The Chair's disclosure application has to be made by the DfE; the School cannot handle it as they would for all other Governors. So, even if a Governor, whom the School has already checked, becomes Chair, the DfE has to make yet another check.

2.3 Induction of Governors and Trustees

Governors would be provided with training on the following once in post:

- Child Protection Policy and safeguarding obligations
- Staff Behaviour Policy
- Health and Safety
- Confidentiality obligations
- Supervision
- Data Protection



- Online Safety (to include an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring)

2.4 Data Protection

The School will comply with its obligations under the relevant data protection legislation. Governors' attention should be drawn to the Staff Privacy Notice and Data Protection Policy which sets out details of how the School will process Governors' personal data.

3. THE RECRUITMENT OF OTHER VOLUNTEERS

General. Volunteers bring with them a range of skills and experience that can enhance the learning opportunities of pupils. The Board of Governors therefore, welcomes and encourages volunteers to assist in its day to day running. The kinds of activities that volunteers may assist with are hearing pupils read, working with small groups of pupils to assist them in their learning, working alongside individual pupils, as an additional tutor, or accompanying school visits. Volunteers will be recruited and vetted via the process set out below. Volunteers who take part in a regulated activity will be subject to safer recruitment checks.

Recruitment. Volunteers will be subject to an informal recruitment process which will involve a meeting with a member of the SLT to discuss the requirements of the School and the skills of the volunteer. The purpose of this meeting will be to understand whether the prospective volunteer has any previous relevant experience and find out whether the expectations and requirements of each party meet and whether there is a volunteering opportunity at the School. Any volunteering placement may be offered subject to the following checks, if relevant:

- a. An enhanced DBS certificate;
- b. If the volunteer will be undertaking a regulated activity, a barred list check;
- c. Evidence of their entitlement to work in the UK, where relevant;
- d. Confirmation that the volunteer has not been disqualified from participating in the management of independent schools;
- e. the successful candidate will be undertaking a regulated activity and has worked or been resident overseas, such checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered;
- f. A declaration that they are not disqualified from providing childcare under the Childcare (Disqualification) Regulations 2009;
- g. Depending on the role, the volunteer may also be asked to sign a confidentiality statement;
- h. References may also be required.

Induction. Volunteers will be provided with information on the following matters and will be asked to sign they have read and understood the below information:

- a. Safeguarding and Child Protection Policy including KCSiE and Prevent 2023
- b. Staff Behaviour Policy
- c. Health and Safety Policy
- d. Data Protection Policy
- e. Confidentiality obligations



Data Protection

The School will comply with its obligations under the relevant data protection legislation. Volunteers' attention should be drawn to the Staff Privacy Notice and Data Protection Policy which sets out details of how the School will process volunteers' personal data.

[1] The UK has introduced a points-based immigration system that applies to anyone who wants to come to live, study or work in the UK. Irish citizens will continue to be able to enter, work and study in the UK as they do now. Schools will need to be mindful of the changing requirements when recruiting staff from overseas.

[2] The requirement to check an overseas' teacher's teaching status for proof of past conduct as a teacher is now included in KCSIE at paragraphs 149 and 172. Schools and colleges must make any further checks they think appropriatewhich could include obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. We therefore recommend that schools request the letter of professional standing for recruitment for teachers from all overseas applicants where possible



Appendix 1

Policy on the Recruitment of Ex-Offenders

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

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for the School to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for the School to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful for the School to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the statutory guidance "Disqualification under the Childcare Act 2006".

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. The School will report the matter to the Police and/or the DBS if:

- the School receives an application from a disqualified person;
- is provided with false information in, or in support of, an applicant's application; or
- the School has serious concerns about an applicant's suitability to work with children.

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 School will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- whether the conviction or caution is 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020 (if yes, it will not be taken into account);
- 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;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.



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 the following offences: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence, serious class A 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 at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving.



Appendix 2

RECRUITMENT PRIVACY NOTICE

Data protection privacy notice (recruitment)

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. It applies to all individuals applying for a position at the School, including positions as a member of staff (full time or part time), contractors, workers, governors, volunteers and peripatetic staff. It also applies to individuals we will contact in order to find out more about our job applicants, including referees, or those that are provided by job applicants as an emergency contact.

You are being sent a copy of this privacy notice because you are applying to work with us (whether as an employee, worker, or contractor). We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

Willington Prep School ('School') is a 'controller' in relation to personal data and gathers and uses certain information about you. This means that we are responsible for deciding how we hold and use your personal information.

The School's contact details are as follows:

Willington Prep School
Worcester Road
Wimbledon
SW19 7QQ
T: 020 8944 7020
E: office@willingtonschool.co.uk

Data protection principles

We will comply with the data protection law and principles when gathering and using personal information, as set out in our Data Protection Policy. This means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.



About the information we collect and hold

The table in Part 1 of the Schedule below summarises the information we collect and hold, up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part 2 of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate and necessary for specific legitimate purposes. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held on school premises in our filing systems and on our servers and on our Google drives. It may also be held on our behalf by third party agencies, service providers and representatives.

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application, or the application you are supporting (e.g. as a referee) is successful and you (the job applicant) become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. This is likely to be for six months from the communication of the outcome of the recruitment exercise which takes account of both the time limit to bring claims and for claims to be received by the School. If there is a lawful reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If you are an applicant and your application is successful and you join the School, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see the School Privacy Notice.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Further details on our approach to information retention and destruction are available in our data protection policy that gives these details.

Your DATA rights to correct and access your information and to ask for it to be erased

Please contact our HR officer or Bursar, who can be contacted as detailed under 1 above if you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have other rights including the right to ask for information we hold and process to be erased ('the right to be forgotten') or not used in certain circumstances. Our Bursar, will provide you with further



information about your data rights, if you ask for it. You may also want to read the School Privacy Notice which provides more detail on this.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes personal information being locked away, password protected or encrypted. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected personal data breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

The Bursar oversees compliance with this privacy notice. We hope that our Bursar can resolve any query or concern you raise about our use of your information. If not, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or telephone 0303 123 1113 for further information about your rights and how to make a formal complaint.



SCHEDULE About the information we collect and hold

Part 1 Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your current and any former names, title, date of birth, gender, national insurance number, and contact details (i.e. current address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable the school to contact you to progress your application, arrange interviews and inform you of the outcome To inform the school staff of your application
Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision
Your name, contact details and details of your qualifications, experience, employment history and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Consent (if given): if you are unsuccessful in your application, your details may be passed on to an associated School to see if they have any suitable vacancies	To see whether an associated School has any suitable vacancies
Information about you that is publicly available online through online searches	From standard online searches using a web browser, website, or social media platform.	Legitimate interest: to form part of the school's wider safeguarding due diligence. Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit. To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE).	To make an informed recruitment decision. Search results will be reviewed and, if appropriate, explored with the applicant at interview. To comply with legal/regulatory obligations.



Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process To comply with our legal obligations to request references	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR and the referee
Criminal Record Information or information that would make you unsuitable to work with children	From your self-declaration form	Legitimate interests: to carry out a fair recruitment process including giving candidates the opportunity to discuss their disclosure with the School before a DBS check is obtained. To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	To make an informed recruitment decision and give candidates the opportunity to discuss their disclosure with the School. To comply with legal/regulatory obligations



Part 2 Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time keeping and attendance, the reason you left your current or most recent post, and facts of any substantiated safeguarding concerns/allegations that meet the harm threshold under the statutory guidance "Keeping Children Safe in Education" (KCSIE), from references obtained about you from previous employers and/or education providers ☐	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	To obtain the required reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR
In respect of applicants for teaching positions who have lived or worked outside the UK, information about any sanctions or restrictions and/or any circumstances impacting your suitability to teach ☐	From a letter from the professional regulating authority in the country (or countries) in which you have worked	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel Information shared with DBS and other regulatory authorities as required
Information regarding your academic and professional qualifications ☐	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision



		To comply with our legal obligations	
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) in accordance with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended) and, where appropriate, overseas criminal records checks ☐	From the Disclosure and Barring Service (DBS) From overseas jurisdictions in accordance with Home Office guidance In respect of agency and third-party staff (supply staff), from any agency or third party organisation In respect of fee-funded trainee teachers, from the initial teacher training provider	To perform the employment contract To comply with our legal obligations Legitimate interest: For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information ☐	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
Information regarding your health, including your medical history, present health status and any workplace adjustments required ☐	From you, including via a health questionnaire.	To comply with our legal obligations including those contained in the Equality Act 2010 and statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE)	To make an informed recruitment decision To comply with legal/regulatory obligations including considering adjustments necessary to enable you to perform the role for which you have applied Information shared with the School's medical advisers including the School doctor and occupational health adviser Information shared with medical adviser carrying out your medical examination

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.