

SANCTON WOOD SCHOOL

Recruitment, Selection & Disclosure Policy & Procedure

September 2025

1 Introduction

Sancton Wood School is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff.

The School recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment. The aims of the School's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;
- to ensure compliance with all relevant legislation, recommendations and guidance including the Education (Independent School Standards) Regulations 2014 (ISSRs), the statutory guidance published by the Department for Education (DfE), **Keeping Children Safe in Education (1 September 2025) (KCSIE)**, Disqualification Under the Childcare Act 2006 (DUCA), the Prevent Duty Guidance for England and Wales (2015 updated on 1 April 2021) (the Prevent Duty Guidance), **Working Together to Improve School Attendance 2024 (statutory guidance)**, and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. For September 2025-26 the members of staff who have received the one day Safer Recruitment Consortium training are:

- Ellie Bullman (Bursar), Richard Settle (Principal), Kylie Hodges (Head of prep), Ed Batty (Head of Seniors), Debra King (Co-Curricular Vice Principal), Clara Furmaniak (Deputy Nursery Lead), Victoria Fonzo (Admissions).

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

Advertising

When advertising roles, we will make clear:

1. Our school's commitment to safeguarding and promoting the welfare of children
2. That safeguarding checks will be undertaken
3. The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
4. Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

5. Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
6. Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

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

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

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

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Online Searches

We will also conduct online searches on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Our online search procedures will:

- Be conducted by trained senior staff members
- Focus on publicly available information that may be relevant to safeguarding concerns
- Be documented appropriately with evidence retained where relevant
- Be conducted in a fair and proportionate manner
- Consider any information found in the context of the role and potential safeguarding implications
- Include searches of social media platforms, news articles, and other publicly accessible online content
- Be carried out at an appropriate stage in the recruitment process after shortlisting

Any concerns identified through online searches will be:

- Explored further with the candidate at interview
- Documented with clear rationale for decisions made
- Considered alongside all other recruitment information

Seeking references and checking employment history

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

When seeking references we will:

11. Not accept open references
12. Liaise directly with referees and verify any information contained within references with the referees
13. Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
14. Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
15. Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
16. Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
17. Resolve any concerns before any appointment is confirmed

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Interview and selection

When interviewing candidates, we will:

18. Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
19. Explore any potential areas of concern to determine the candidate's suitability to work with children
20. Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

21. Verify their identity
22. Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
23. Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
24. Verify their mental and physical fitness to carry out their work responsibilities
25. Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
26. Verify their professional qualifications, as appropriate
27. Ensure they are not subject to a prohibition order if they are employed to be a teacher
28. Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - a. For all staff, including teaching positions: criminal records checks for overseas applicants
 - b. For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
29. **Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state using the GOV.UK "Check if a person is prohibited from managing an independent school" service**

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We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

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

Existing staff

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

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

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

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

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

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

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months.

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

13. Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
14. Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
15. Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
16. Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors [in academies: All trustees, local governors and members] will have an enhanced DBS check without barred list information.

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

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

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

17. **A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008) using the GOV.UK "Check if a person is prohibited from managing an independent school" service.** [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
18. Identity
19. Right to work in the UK
20. Other checks deemed necessary if they have lived or worked outside the UK

All governors will also have the following checks:

21. Identity
22. Right to work in the UK
23. Other checks deemed necessary if they have lived or worked outside the UK

Alternative Provision Settings

Where we place a pupil with an alternative provision provider, we will:

- **Obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform**
- **Ensure written confirmation that the alternative provider will inform us of any arrangements that may put the child at risk (i.e., staff changes), so that we can check these arrangements too**
- **Maintain knowledge of where our pupils are throughout school hours (i.e., the address where they are being educated)**
- **Review alternative provision placements at least half-termly to ensure children are attending, their needs are met and the setting is safe, with the potential that the placement is ended if any concerns are not addressed**

Adults who supervise pupils on work experience

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

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

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Pupils staying with host families

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

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

Additional Safeguarding Considerations

Online Safety and Digital Safeguarding

We recognise that online harms now explicitly include misinformation, disinformation (including fake news) and conspiracy theories. All staff involved in recruitment will be aware of these evolving digital risks when conducting online searches and assessing candidates' suitability.

Support for Children with Specific Needs

We will ensure that staff recruited are appropriately trained and equipped to support:

- Children who are lesbian, gay, bisexual, or gender questioning (noting that revised guidance on gender questioning children is expected to be published)
- Children with autism (using current terminology aligned with the SEND Code of Practice)
- Children in kinship care (recognising the extended non-statutory responsibilities of Virtual School Heads)

Mental Health and Wellbeing

All staff will receive appropriate training on supporting children's mental health and wellbeing as part of our comprehensive safeguarding approach, recognising the strong links between mental health and safeguarding.

Prohibition and Barring Checks - Updated Procedures

For teaching positions, we will use the GOV.UK "Check a teacher's record" service to verify:

- Teacher qualification status
- Any prohibition orders
- Any restrictions or sanctions

For management positions, we will use the GOV.UK "Check if a person is prohibited from managing an independent school" service for Section 128 checks.

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Record Keeping and Data Protection

We will maintain comprehensive records in accordance with:

- KCSIE 2025 requirements
- The Information Commissioner's Employment Practices Code
- DfE Data Protection guidance for schools
- Independent School Standards Regulations 2014

All safeguarding records, including recruitment decisions, will be stored securely and retained in accordance with statutory requirements and our data retention policy.

Policy Review Date: September 2026

Next Review: This policy will be reviewed annually or following any significant changes to relevant legislation or guidance

Policy Owner: Richard Settle (Principal)

Approved by: [Governing Body]

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The school recognises that student attendance can be impacted by a variety of factors and circumstances. When concerns arise about a student's absences, the school will proactively contact parents/carer to discuss the situation and collaboratively develop a plan to improve attendance. The school aims to take a flexible, individualised approach, which may involve measures such as a part-time schedule, coordination with external support agencies, therapy, support through the school's ELSA (Emotional Literacy Support Assistant) program, or providing a quiet workspace for students who are feeling overwhelmed. Any adjustments or interventions will be implemented with the full consent and involvement of the student and their parents/carers. Through open communication and tailored support, the school strives to remove barriers and facilitate consistent attendance for all students.

Where a pupil has an education health and care (EHC) plan and their attendance falls, or the school becomes aware of barriers to attendance that related to the pupil's needs, the school will inform the local authority.

7.3 Pupils returning to school after a lengthy or unavoidable period of absence

To support students in successfully reintegrating into the school environment after an extended absence, the school will collaborate closely with students and their parents/carers to develop an individualised transition plan. Depending on the circumstances, this plan may involve a gradual return through a part-time schedule, working with the school's Emotional Literacy Support Assistant (ELSA) to address any emotional or social concerns, or a phased approach that combines supervised time in a quiet workspace under the guidance of the Special Educational Needs and Disabilities (SEND) team with gradual reintroduction to class lessons. The transition process will be reviewed weekly, with targets set in partnership with the student and their parents/carers. When appropriate, the school will also coordinate with external agencies and support services to ensure a comprehensive and holistic approach to facilitating the student's smooth transition back into fulltime learning.

8. Attendance monitoring

Prep: Half termly Attendance data reports for all children to be generated by Isams and letters sent out electronically to parents. Teachers to report attendance data during parents consultations in October and March and in the end of year reports.

Senior: Half termly Attendance data reports will be generated by Isams and letters sent out electronically to parents. For any students with attendance that is of a concern, below 90%, their parents will be contacted by their form tutor and if necessary, will be asked to come in for a meeting to discuss how we can improve attendance.

8.1 Monitoring attendance

The school will monitor attendance and absence data (including punctuality) half-termly, termly and yearly across the school and at an individual pupil, year group and cohort level.

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Specific pupil information will be shared with the DfE on request.

Data will be collected each term and published at national and local authority level through the DfE's school absence national statistics releases. The underlying school-level absence data is published alongside the national statistics.

The school will benchmark its attendance data at whole school, year group and cohort level against local, regional, and national levels to identify areas of focus for improvement, and share this with the governing board.

8.2 Analysing attendance

The school will:

Analyse attendance and absence data regularly to identify pupils, groups or cohorts that need additional support with their attendance, and

- Identify pupils whose absences may be a cause for concern, especially those who demonstrate patterns of persistent or severe absence
- Conduct thorough analysis of half-termly, termly, and full-year data to identify patterns and trends
- Look at historic and emerging patterns of attendance and absence, and then develop strategies to address these patterns

8.3 Using data to improve attendance

The school will:

- Develop targeted actions to address patterns of absence (of all severities) of individual pupils, groups or cohorts that it has identified via data analysis
- Provide targeted support to the pupils it has identified whose absences may be a cause for concern, especially those who demonstrate patterns of persistent or severe absence, and their families (see section 8.4 below)
- Provide regular attendance reports to class teachers/form tutors, to facilitate discussions with pupils and families, and to the governing board and school leaders (including special educational needs coordinators, designated safeguarding leads)
- Use data to monitor and evaluate the impact of any interventions put in place in order to modify them and inform future strategies
- Share information and work collaboratively with other schools in the area, local authorities and other partners where a pupil's absence is at risk of becoming persistent or severe, including keeping them informed regarding specific pupils, where appropriate

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8.4 Reducing persistent and severe absence

Persistent absence is where a pupil misses 10% or more of school, and severe absence is where a pupil misses 50% or more of school. Reducing persistent and severe absence is central to the school's strategy for improving attendance.

The school will:

- Use attendance data to find patterns and trends of persistent and severe absence
- Consider potential safeguarding issues and, where suspected or present, address them in line with Keeping Children Safe in Education
- Hold regular meetings with the parents of pupils who the school (and/or local authority) considers to be vulnerable or at risk of persistent or severe absence, or who are persistently or severely absent, to:
 - Discuss attendance and engagement at school
 - Listen, and understand barriers to attendance
 - Explain the help that is available
 - Explain the potential consequences of, and sanctions for, persistent and severe absence
 - Review any existing actions or interventions
- Provide access to wider support services to remove the barriers to attendance, in conjunction with the local authority, where relevant
- Consider alternative support that could be put in place to remove any barriers to attendance and reengage these pupils. In doing so, the school will sensitively consider some of the reasons for absence
- Implement sanctions, where necessary (see section 5.2, above)

Send letters home raising the schools concerns, Offer meeting with parents/carers and students

9. Monitoring arrangements

This policy will be reviewed as guidance from the local authority and/or DfE is updated, and as a minimum Yearly by Hannah Settle.

10. Links with other policies

This policy links to the following policies: •

Child protection and safeguarding policy

- Promoting Good Behaviour.



Appendix 1: attendance codes

The following codes are taken from the DfE's [guidance on school attendance](#).

Code	Definition	Scenario
/	Present (am)	Pupil is present at morning registration
\	Present (pm)	Pupil is present at afternoon registration
L	Late arrival	Pupil arrives late before register has closed
Attending a place other than the school		
K	Attending education provision arranged by the local authority	Pupil is attending a place other than a school at which they are registered, for educational provision arranged by the local authority
V	Attending an educational visit or trip	Pupil is on an educational visit/trip organised or approved by the school
P	Participating in a sporting activity	Pupil is participating in a supervised sporting activity approved by the school
W	Attending work experience	Pupil is on an approved work experience placement
B	Attending any other approved educational activity	Pupil is attending a place for an approved educational activity that is not a sporting activity or work experience
D	Dual registered	Pupil is attending a session at another setting where they are also registered
Absent – leave of absence		
C1	Participating in a regulated performance or undertaking regulated employment abroad	Pupil is undertaking employment (paid or unpaid) during school hours, approved by the school



M	Medical/dental appointment	Pupil is at a medical or dental appointment
J1	Interview	Pupil has an interview with a prospective employer/educational establishment
S	Study leave	Pupil has been granted leave of absence to study for a public examination

X	Not required to be in school	Pupil of non-compulsory school age is not required to attend
C2	Part-time timetable	Pupil is not in school due to having a part-time timetable
C	Exceptional circumstances	Pupil has been granted a leave of absence due to exceptional circumstances

Absent – other authorised reasons

T	Parent travelling for occupational purposes	Pupil is a 'mobile child' who is travelling with their parent(s) who are travelling for occupational purposes
R	Religious observance	Pupil is taking part in a day of religious observance
I	Illness (not medical or dental appointment)	Pupil is unable to attend due to illness (either related to physical or mental health)
E	Suspended or excluded	Pupil has been suspended or excluded from school and no alternative provision has been made

Absent – unable to attend school because of unavoidable cause

Q	Lack of access arrangements	Pupil is unable to attend school because the local authority has failed to make access arrangements to enable attendance at school
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Y1	Transport not available	Pupil is unable to attend because school is not within walking distance of their home and the transport normally provided is not available
Y2	Widespread disruption to travel	Pupil is unable to attend because of widespread disruption to travel caused by a local, national or international emergency
Y3	Part of school premises closed	Pupil is unable to attend because they cannot practicably be accommodated in the part of the premises that remains open
Y4	Whole school site unexpectedly closed	Every pupil absent as the school is closed unexpectedly (e.g. due to adverse weather)
Y5	Criminal justice detention	Pupil is unable to attend as they are:
		<ul style="list-style-type: none"> • In police detention • Remanded to youth detention, awaiting trial or sentencing, or • Detained under a sentence of detention
Y6	Public health guidance or law	Pupil's travel to or attendance at the school would be prohibited under public health guidance or law
Y7	Any other unavoidable cause	To be used where an unavoidable cause is not covered by the other codes
Absent – unauthorised absence		
G	Holiday not granted by the school	Pupil is absent for the purpose of a holiday, not approved by the school
N	Reason for absence not yet established	Reason for absence has not been established before the register closes
O	Absent in other or unknown circumstances	No reason for absence has been established, or the school isn't satisfied that the reason given would be recorded using one of the codes for authorised absence



U	Arrived in school after registration closed	Pupil has arrived late, after the register has closed but before the end of session
Administrative codes		
Z	Prospective pupil not on admission register	Pupil has not joined school yet but has been registered
#	Planned whole-school closure	Whole-school closures that are known and planned in advance, including school holidays