



Recruitment, Selection and Disclosure Policy and Procedure

Legal Status:

- Part 4 of the Education (Independent School Standards) (England) Regulations 2014 (**ISSR**), with reference to the appointment of Trustees (Proprietors) all staff, external providers and volunteers inclusive of completion of the Single Central Register (**SCR**);
- Keeping Children Safe in Education September 2019 (**KCSIE**);
- Working Together to Safeguard Children (**WT**) July 2018 along with any further amendments as they are published;
- The Equality Act (**EA**) 2010 along with further implementation as of April 2011;
- National Minimum Standards for Boarding Schools (**NMS**).

To be read with:

- Twyford School Safeguarding Policies and Procedures
- AGBIS Guidelines for Governors

Monitoring

The Chair of Governors and Headmaster will formally review the suitability and implementation of this policy and procedure by no later than one year from the date shown below, or earlier if changes in legislation, regulatory requirements or best practice guidelines so require.

Mr Andrew Harvey

Headmaster

Updated October 2020

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Safer Recruitment Policy

Introduction

Twyford 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.

Employment and Safer Recruitment

We will do all we can to ensure that all those working with children in our school are suitable people. This involves scrutinizing applicants, verifying their identity, checking their employment history and qualifications and obtaining independent references that answer specific questions to help assess their suitability to work with children.

All employees will be subject to the mandatory check of the children's List and a criminal records check.

To ensure a consistent and thorough process of safer recruitment in order to ensure that those recruited are suitable we follow all DfE guidance (currently KCSIE September 2019 Part Three: Safer Recruitment).

Our safer recruitment practice includes those persons who may not have direct contact with children but because of their presence will still be seen as safe and trustworthy e.g. volunteers, support staff.

Scope of this Policy

This Policy and Procedure refers and applies to staff directly recruited and employed by the School. In the Education (Independent Schools Standards) (England) Regulations 2010, 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 shall obtain written confirmation from the agency or company that it has carried out the appropriate checks.

Aims

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, linguistic background, religion or religious belief, sex or sexual orientation, gender reassignment, pregnancy and maternity, marital or civil partner status, disability or age;
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE) (formerly the Department for Children, Schools and Families (DCSF)), Keeping

Children Safe in Education (KCSIE), National Minimum Standards for Boarding Schools (NMS) 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. In compliance with ISSR 2014 Para 18, we intend always to appoint suitable persons as members of staff at Twyford School.

Dr Steve Bailey
Headmaster
September 2019

Safer Recruitment Procedure

Requirement Identification to Selection

Requisition Form

The recruitment process begins with the generation of a Requisition Form (RF). This will either occur when a staff vacancy arises through resignation, or when a discussion within the Senior Leadership Team leads to a proposal for an additional post to be created.

Where a vacancy is identified the RF must be counter-signed by both the Headmaster and Bursar. Any new post must be authorised by both the Chair of Governors and the Chair of the Finance Committee in advance of any further action.

The RF takes the form of a checklist that must be followed strictly in order to ensure all elements of safer recruitment are observed. This becomes the formal record of process, and is stored in the successful candidate's personnel file on appointment.

Job Description and Person Specification

A job description and person specification will be drawn up by the Head of Department or sponsor member of the Senior Leadership Team, as appropriate. This will include all specific requirements relating to the post, as well as the generic requirements for a Teacher at Twyford School. We will make an assessment of each post to include details of the post's responsibilities, the degree of (un)supervised access to the children and the key skills/qualifications required.

Advertisement

Our advertisements include the mandatory application form and feature a safeguarding statement. All our adverts carry:

- a statement on the school's policy towards safeguarding children;
- the requirement for criminal records check.

Application Form

Application forms contain questions about academic and employment history and suitability for role. All applicants for employment will be required to complete the relevant Application Form in full. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. Any gaps in an applicant's employment history will be checked and the reason noted. CVs will not be accepted in substitution for completed Application Forms.

Applicants are to be informed that any previous employer may be contacted for a reference; references received will be checked, by telephone, with the author. The School will also 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.

As the position for which candidates are applying involves substantial opportunity for access to children, it is important that applicants provide the School with legally accurate answers. Upfront disclosure of a criminal record may not debar a candidate from appointment as the School shall consider the nature of the offence, how long ago and at what age it was committed and any other relevant factors. Information should be submitted in confidence enclosing details in a separate sealed envelope which will be seen and then destroyed by the

Head/Bursar. If candidates would like to discuss this beforehand, they are asked to please telephone in confidence to the Head/Bursar for advice.

The Rehabilitation of Offenders 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013 provides that certain spent convictions and cautions are 'protected' and are not subject to disclosure to employers, and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found at the Disclosure and Barring Service website.

Any unspent convictions, cautions, reprimands or warnings must be disclosed to the School (see Convictions on page 11) and these will be considered in the context of Annex A - Policy on recruitment of ex-offenders commencing on page 16.

The successful applicant will be required to complete a Disclosure Form on line from the Disclosure and Barring Service ("DBS"). 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.

Disqualification under the childcare act

The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare. Previously this disqualification also extended to risk by association of anyone living within the same household and required us to carry out a self-disclosure process with staff. The risk by association element of the Act has now been refocused by the DfE and no longer applies to school staff. We will continue to check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.

The Childcare (Disqualification) Regulations 2009 apply 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. He/she must also notify the school immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

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 Head/Bursar for more details.

Failure to declare any convictions (that are not subject to DBS filtering) may disqualify a candidate for appointment or result in summary dismissal if the discrepancy comes to light subsequently.

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.

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.

Queries

If an applicant has any queries on how to complete the application form or any other matter he / she should contact the Bursar or Headmaster.

Long- and Short-Listing

Application forms will be reviewed after the closing date by the Headmaster, the Bursar and the appropriate Head of Department. A long list may be drawn up. Sometimes it may be appropriate to proceed straight to a short-list. The selection of candidates for interview will be made with direct reference to the job description and person specification, set against each applicant's qualifications and experience.

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

Formal Interview

The interview will be conducted in person and during the interview the candidate's suitability to work with children will be explored. Applicants' identities will be verified before interview starts.

All formal interviews will have a panel of at least three people chaired by the Head/Bursar or another designated senior member of staff. 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.

All candidates invited to interview must bring documents confirming their identity as well as 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.

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.

A written record will be kept of all interviews.

Offer

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment;

- verification of the applicant's identity (where that has not previously been verified);
- the receipt of two references (one of which must be from the applicant's most recent employer) which the School considers to be satisfactory.
- for teaching positions, confirmation that the applicant is not subject to a prohibition order will be confirmed against the Employer Access Online System;
- the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory (see section 4);
- where the position amounts to "regulated activity" (see Regulated Activity on page 12 below) confirmation that the applicant is not named on the Children's Barred List administered by the DBS*;
- verification of the applicant's medical fitness for the role (see Medical Fitness on page 13 below); and
- verification of the applicant's right to work in the UK (documents either provided by the candidate or check made by the School);
- any further checks which are necessary as a result of the applicant having lived or worked outside of the UK;
- verification of professional qualifications which the School deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified)
- confirmation that the candidate is not disqualified 'by association' under the Childcare (Disqualification) Regulations 2009 (see 2.6 below);
- for both internal and external appointments for a position in management (including Head, Head of Department or member of the Senior Leadership Team) confirmation that the candidate has not been barred by the Secretary of State under section 128 of the Education and Skills Act 2008 (see 2.5 below).

*A check of the Children's Barred List is not permitted if an individual will not be undertaking "regulated activity". Whether a position amounts to "regulated activity" must therefore be considered by the School in order to decide which DBS checks are appropriate. It is however likely that in nearly all cases a Children's Barred List check will be carried out.

Pre-employment checks

The following checks will be conducted as appropriate:

Verification of identity and address

All applicants who are invited to an interview will be required to bring with them evidence of identity, right to work in the UK, address and qualifications as set out below and in the list of valid identity documents at Annex D - List of valid identity documents on page 21 (these requirements comply with DBS identity checking guidelines):

- one document from Group 1; and

- two further documents from either of Group 1, Group 2a or Group 2b, one of which must verify the applicant's current address; and
- original documents confirming any educational and professional qualifications referred to in their application form.

Where an applicant claims to have changed his / her name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) he / she will be required to provide documentary evidence of the change.

The School asks for the date of birth of all applicants (and proof of this) in accordance with KCSIE. Proof of date of birth is necessary so that the School may verify the identity of, and check for any unexplained discrepancies in the employment and education history of all applicants. The School does not discriminate on the grounds of age.

References

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the School. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend.

References will be taken up on short listed candidates where possible prior to interview. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made. 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.

If it is necessary to accept a telephone reference the information gained will be detailed, dated and signed; these references will be followed up in writing.

The School will ask all referees if the candidate is suitable to work with children.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. All referees will be sent a copy of the job description and person specification for the role for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title / duties, reason for leaving, performance, sickness* and disciplinary record;
- whether the applicant has ever been the *subject of disciplinary procedures* involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be false, unsubstantiated, unfounded or malicious; and
- whether any *allegations or concerns have been raised* about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people, except where the allegation or concerns were found to be false, unsubstantiated, unfounded or malicious.

(*questions about health or sickness records will only be included in reference requests sent out after the offer of employment has been made.)

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 compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

References will be verified by telephone with the author in each case.

Criminal records check

Owing to the nature of the work, the School applies for an enhanced disclosure from the DBS in respect of all prospective staff members, governors and volunteers.

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 required DBS checks.

The School complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request.

Convictions

Prior to 29 May 2013 an enhanced disclosure contained details of all convictions on record (are including those which defined as "spent" under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. It could also contain non-conviction information from local police records which a chief police officer considered relevant to the role applied for at the School.

As of 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The DBS and the Home Office have developed a set of filtering rules relating to spent convictions which work as follows:

For those aged 18 or over at the time of an offence

An adult conviction will be removed from a DBS disclosure if:

- eleven years have elapsed since the date of conviction;
- it is the person's only offence; and
- it did not result in a custodial sentence.

It will not be removed under any circumstances if it appears on a list of "**specified offences**" which must always be disclosed. If a person has more than one offence on their criminal record, then details of all their convictions will always be included.

A caution received when a person was aged 18 or over will not be disclosed if six years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

For those aged under 18 at the time of an offence

A conviction will removed from a DBS disclosure if:

- five and a half years have elapsed since the date of conviction; and
- it is the person's only offence; and
- it did not result in a custodial sentence.

Again, the conviction will not be removed under any circumstances if it appears on the list of "specified offences", or if a person has more than one offence on their criminal record.

A caution received when a person was aged under 18 will not be disclosed if two years have elapsed since the date it was issued, and if it does not appear on the list of "specified offences".

The list of "specified offences" which must always be disclosed

This contains a large number of offences, which includes certain sexual, violent and other offences that are considered so serious they will always be disclosed, regardless of when they took place or of the person's previous or subsequent criminal record. The list of "specified offences" can be found at:

<https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check>.

Regulated Activity

The School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the School which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List maintained by the DBS. Any position undertaken at, or on behalf of, the School (whether paid or unpaid), will amount to "regulated activity" if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the "period condition", meaning four times or more in a 30 day period; and
- provides the opportunity for contact with children.

This definition will cover nearly all posts at the School. Limited exceptions could include an administrative post undertaken on a temporary basis in the School office outside of term time.

It is for the School to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances.

DBS Certificates

The DBS now issues a DBS disclosure certificate to the subject of the check only, rather than to the School. It is a condition of employment with the School that the **original** disclosure certificate is provided to the School within two weeks of it being received by the applicant. A convenient time and date for doing so should be arranged with the HR and Compliance Manager as soon as the certificate has been received.

Original certificates should not be sent by post. Applicants who are unable to attend at the School to provide the certificate are required to send in a *certified copy* by post or email within two weeks of the original disclosure certificate being received. Certified copies must be sent to the HR and Compliance Manager. Where a certified copy is sent, the original disclosure certificate must still be provided prior to the first day of work. Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School.

If there is a delay in receiving a DBS disclosure the Head has discretion to allow an individual to begin work pending receipt of the disclosure. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once a written risk assessment has been

completed and appropriate supervision has been put in place. This risk assessment must be reviewed every two weeks until the DBS has been received.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants may also be asked to provide further information, including a criminal records check from the relevant jurisdiction(s).

Medical Fitness

Any offer of employment will be subject to verification of medical fitness. The School is legally required to verify the medical fitness of anyone to be appointed to a post at the School, after an offer of employment has been made but before the appointment can be confirmed.

Therefore, it is the School's practice that a successful candidate must complete a pre-employment health questionnaire. All prospective employees are asked to complete pre-employment questionnaires after they have accepted a conditional offer of employment at the school. The information contained in the questionnaire will then be held by the School in strictest confidence. 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, layout of the School.

Based on this review, the School may elect to have the information contained in the Health Questionnaire reviewed by the School's medical advisor. If the School's medical advisor has any doubts about an applicant's fitness the School will consider reasonable adjustments in consultation with the applicant. The School may also seek a further medical opinion from a specialist or request that the applicant undertake a full medical assessment.

The School is an equal opportunities employer and welcome applications from all candidates. 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.

Successful applicants will also be required to sign a declaration of medical fitness confirming that there are no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the role. If an applicant prefers to discuss this with the School instead, or to attend an occupational health assessment to consider their fitness for the role, they should contact the Bursar so that appropriate arrangements can be made.

Prohibition Orders

Qualified Teacher Status is not a requirement for teachers in the independent sector, but schools must now check that anyone employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State. The check is completed using the free Employer Online service, and can be undertaken on individuals who do not have QTS by searching by name. This applies to those appointed to teach on or after 1 April 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
- Reporting on the development, progress and attainment of pupils.

Implementation of EU Directive 2005/36/E

From 18 January where any European Economic Area (EEA) authority that has responsibility for regulating the teaching profession imposes a restriction on a person's ability to work as a teacher, this information must be shared with all other EEA teacher regulators.

In addition to the normal teacher prohibition pre-appointment checks detailed at part 3 of 'Keeping Children Safe in Education' statutory guidance, schools can now use the Employer Access (EA) Online Service to also identify restrictions imposed by all EEA authorities.

Restrictions imposed by another EEA authority do not prevent an individual from taking up teaching positions in England. However, schools should consider the circumstances leading to the restriction when considering a candidate's suitability. The EA Online service explains how to get additional information about EEA restrictions.

Prohibition from management of independent schools directions (also known as "section 128 directions")

Schools must check whether staff appointed to management positions after that date are subject to a s.128 direction. For staff in regulated activity, the check is done via the DBS; a s.128 direction would show on a DBS barred list check. Schools must include on the DBS application form, within box 61, Position Applied for, "Child Workforce Independent School". This allows the DBS to confirm if a s.128 direction has been made. Employees to whom this check will apply include: Headteachers, members of the Senior Leadership Team (including non-teaching staff) and Departmental Heads. If an internal appointment is made, a check will be made via the Employer Access Online System.

Disqualification from Childcare

The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare. Previously this disqualification also extended to risk by association of anyone living within the same household and required us to carry out a self disclosure process with staff.

The risk by association element of the Act has now been refocused by the DfE and no longer applies to school staff.

We will continue to check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.

As part of the recruitment process, applicants will be flagged on the Single Central Register, as appropriate, as being "in scope of DUCA" and a declaration is sought from all those identified as being in scope on the application form (see starting on page 25).

Contractors and Agency Staff

Contractors regularly engaged by the School (eg catering, cleaning) must complete the same checks for their employees that the School is required to complete for its staff. The School requires confirmation that these checks have been completed before employees of the Contractor can commence work at the School.

Agencies who supply staff to the School must also complete the pre-employment checks which the School would otherwise complete for its staff. Again, the School requires confirmation that these checks have been completed before an individual can commence work at the School.

According to Guidance: '

'Schools must check with the relevant supply agency that the required checks have been carried out to the extent relevant to that person: identity, enhanced disclosure, right to work in the UK, barred list/List 99, prohibition, qualifications, overseas checks, disqualification under the Childcare Act 2006. The single central register must show

that all these checks have been carried out to the extent relevant and, in addition, that the school has carried out its own identity check. The school must also see each disclosure certificate, whether or not it discloses any information. The school is not required to retain a copy on file. Additionally, in having regard to KCSIE, the agency should take up references, obtain a declaration of medical fitness, and check previous employment history. 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.'

The School will independently verify the identity of staff supplied by contractors or an agency in accordance with the procedures above.

Self Employed Contractors and Peripatetic Staff

Self-employed contractors and peripatetic staff will be treated as members of Twyford staff for the purposes of this policy.

Annex A - Policy on recruitment of ex-offenders

Background

The School will not unfairly discriminate against any applicant 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 applicant 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 positions within the School 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 for those to which the DBS filtering rules apply (see paragraph above). 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 School to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to attempt to apply for a position at the School. The School will make a report to the Police and / or the 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 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;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

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; or

- 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 within the last ten years.

Assessment procedure

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 carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Bursar and the Headmaster before a position is offered or confirmed.

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

Annex B - Retention and Security of Information

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 if retained, will not be retained for longer than 6 months.

Single Central Register of Appointments

The School will maintain a Single Central Register of Appointments (SCR) that will contain an entry for all current members of staff. The SCR will show the date of the following checks, where applicable, and will record by whom the checks were verified:

- Identity
- Barred List (date of DBS check unless a separate earlier barred list check was undertaken)
- Professional qualifications
- Enhanced disclosure (or DBS Status Check)
- Overseas checks, where applicable
- Right to work in UK
- Prohibition from teaching
- Prohibition from management
- Disqualification from childcare
- Check of application form references, medical fitness verification will also be recorded on SCR

The School is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the School will retain on his / her personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help the School to discharge its obligations as an employer e.g. so that the School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by the School for the duration of the successful applicant's employment with the School. From April 2014, DfE guidance requires the retention of copies of identity documents, right to work, and qualifications.

If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.

Retention of DBS information

The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information, but is under no obligation to do so.

In particular, the School will:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of the School's senior management team and those staff appointed to manage the safer recruitment process;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months.

- The School will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken;
- ensure that any disclosure information is destroyed by suitably secure means such as shredding; and
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates

Medical Records

Completed pre-employment medical questionnaires are stored securely in the individual's personal file.

Annex C - Referrals to the DBS and National College for Teaching and Leadership (NCTL)

This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed.

Whilst these are pre-employment checks the School also has a legal duty to make a referral to the DBS in circumstances where an individual:-

- has applied for a position at the School despite being barred from working with children; or
- has been removed by the School 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 School may also decide to make a referral to the NCTL.

Annex D - List of valid identity documents

Group 1: primary trusted identity credentials

- current valid passport
- biometric residence permit (UK)
- current driving licence (full or provisional) (UK / Isle of Man / Channel Islands; photo card with the associated counterpart licence; except Jersey)
- birth certificate (UK & Channel Islands) - issued at the time of birth (within 42 days of date of birth); Full or short form acceptable including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces

Group 2a: trusted government / state issued documents

- current UK driving licence (old style paper version)
- current non-UK driving licence (valid for up to 12 months from the date the applicant entered the UK)
- birth certificate (UK and Channel Islands) – issued at any time after the date of birth by the General Registrar Office / relevant authority i.e. Registrars)
- marriage / civil partnership certificate (UK and Channel Islands)
- adoption certificate (UK and Channel Islands)
- HM Forces ID card (UK)
- fire arms licence (UK and Channel Islands)

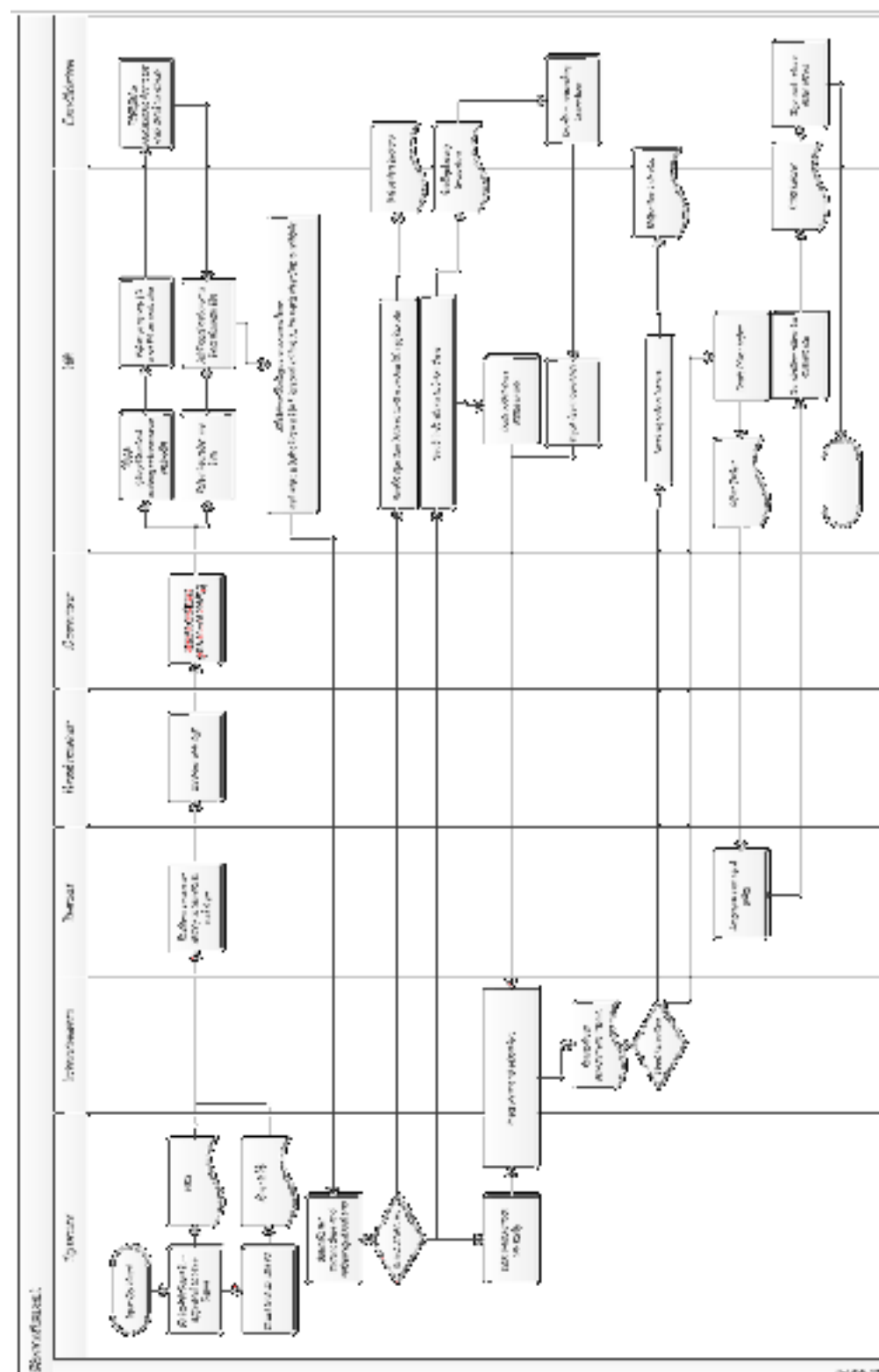
Group 2b: Financial / social history documents

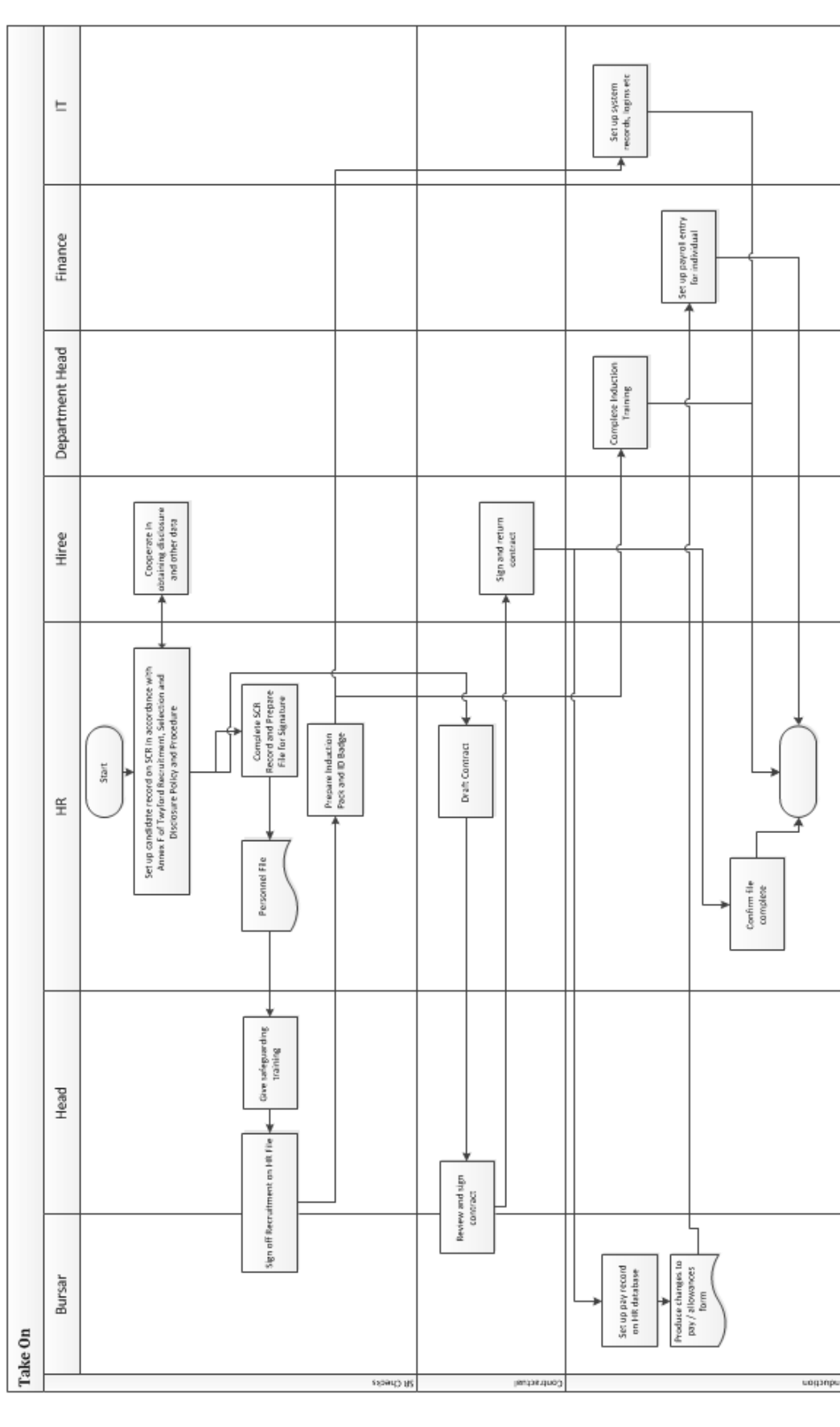
- mortgage statement (UK or EEA)**
- bank / building society statement (UK and Channel Islands or EEA)*
- bank / building society account opening confirmation letter (UK)
- credit card statement (UK or EEA)*
- financial statement ** - e.g. pension, endowment, ISA (UK)
- P45 / P60 statement **(UK and Channel Islands)
- council tax statement (UK and Channel Islands) **
- work permit / visa (UK) (UK Residence Permit) **
- letter of sponsorship from future employment provider (non UK / non EEA only valid for applicants residing outside the UK at the time of application)
- utility bill (UK)* – not mobile telephone
- benefit statement* - e.g. child benefit, pension
- a document from central / local government/ government agency / local authority giving entitlement (UK and Channel Islands)*- e.g. from the Department for Work and Pensions, the Employment Service , HM Revenue & Customs (HMRC), Job Centre, Job Centre Plus, Social Security
- EU national ID card
- cards carrying the PASS accreditation logo (UK)
- letter from Head or College Principal (UK) for 16-19 year olds in full time education. This is only used in exceptional circumstances if other documents cannot be provided.

Note

If a document in the list of valid identity documents is:
denoted with * - it should be less than three months old
denoted with ** - it should be less than 12 months old
not denoted – it can be more than 12 months old

Annex E – Safer Recruitment Process Flowchart





Annex F – Safer Recruitment (Single Central) Register Operations Guide

Background

Twyford School is required by both *The Education (Independent School Standards) (England) Regulations 2014* (the ISSRs) and *Keeping Children Safe in Education* (KCSIE) to maintain a Single Central Register of pre-appointment checks (SCR). This guidance note sets out what information the SCR must contain, who must be included on it and how it must be completed to ensure compliance with regulatory requirements.

Who must be included on the SCR

There are a number of categories of people who will work at the School. Set out below is guidance on which categories must be included in the SCR.

The ISSRs require the School to include on the SCR the following people:

- all staff who work at the School;
- all supply staff who work at the School; and
- all members of the proprietor body i.e. the Governing Body (GB).

Paragraph 204 of the *ISI Handbook for the Inspection of Schools* (the Regulatory Requirements) interprets this as follows (some categories may not be relevant to Twyford School):

Staff in regulated activity	Yes
Staff not in regulated activity	Yes
Volunteer (unsupervised)	Yes, if checks necessary
Volunteer (supervised)	Yes, if checks necessary
Supply staff	Yes
Employees of third parties - Visiting professionals	No*
Contractor's staff	No*
Chair of Governors	Yes
Other Governors governor)	Yes (unless non-proprietor
Adults who supervise children on work experience	No*
Host families	Not if a private arrangement between families

NB those marked “No” may still require vetting checks and inclusion on the SCR is optional – the School chooses to record vetting checks within the SCR.

What information must be included on the SCR

Part 4 of the ISI Handbook states that the SCR must show whether the following checks have been completed:

- Identity
- Children's Barred list/List 99 (date of DBS check unless a separate earlier barred list check was undertaken);
- Professional qualifications;
- Enhanced DBS Disclosure (or DBS Status check if the individual is subscribed to the DBS Update Service);
- Overseas criminal records checks, where applicable;
- Right to work in the UK;

- Prohibition from teaching check
- Prohibition from management check

In addition, paragraph 262 of the ISI Handbook goes on to state that checks of CV/application form, references, medical fitness declaration (and disqualification from childcare if applicable) should ideally be recorded on the SCR to enable a note of all checks to be recorded in one place.

In having regard to this, the School has decided to adopt a best practice approach by entering on the School's SCR all relevant checks (both statutory and non-statutory) and any relevant additional information. A list of all checks which must be recorded on the School's SCR are detailed below together with additional details. Those categories marked with an asterisk * are entries that are in addition to those required by the ISSRs.

The information recorded on the SCR shows whether or not each check was carried out, the date on which the check was completed (or the certificate obtained) and the initials of the member of staff who carried out the check.

- Surname
- First name
- Address
- Date of Birth
- Job Title
- Start Date

The date entered on the SCR must be the date work actually starts rather than the date on which the contract of employment, or other agreement, was signed.

NB ALL checks must be completed and logged on the SCR prior to a person's start date. The only exception to this is the DBS disclosure, provided it has been applied for prior to work commencing. Where a person starts work without the original DBS disclosure having been seen by the School a separate Children's Barred List check must have been undertaken. A risk assessment to determine whether it is appropriate for the person to start, and the level of supervision required, must have been carried out and approved before work can start (see "Notes" below).

- Qualifications required

Where an individual claims to hold qualifications as part of an application for a position these are checked in advance of employment and the date of the check logged under this column.

NB not all appointments are subject to qualification requirements.

- Enhanced DBS disclosure

The ISSRs require the School to undertake an enhanced DBS check on all staff. This covers nearly all appointments to the School workforce. In respect of volunteers, the School carries out a risk assessment to determine whether an Enhanced DBS check is necessary.

- Children's Barred List

Where the position applied for amounts to "regulated activity" (see Safer Recruitment Policy) the School obtains confirmation that the applicant is not named on the Children's Barred List. Most positions at the School will amount to regulated activity and a Children's Barred List check will therefore be carried out in nearly all cases. This check is completed as part of the Enhanced DBS check. Where an individual commences work prior to the School seeing the original DBS disclosure a separate check of the Children's Barred List must be carried out before work starts. Failure to do a separate check in these circumstances will amount to a

regulatory non-compliance. If the check was completed as part of the DBS check only then the date on which the DBS disclosure was received should be the date entered in the Children's Barred List column. If a separate check was undertaken then the date on which it was carried out should be entered on the SCR.

- Acceptance of DBS from another institution

There is no requirement to undertake an enhanced DBS check if, in the three months prior to beginning work at the School, the applicant has worked in another school in England in a post which brought them into regular contact with children or in any position at a school since 12 May 2006 OR in a college in England in a post which involved the provision of education and regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18. The School will accept a DBS certificate (if it satisfies the above requirements) for short term, short notice staff but will carry out a separate Children's Barred List check. However, the School's general policy is to carry out a new DBS check when appointing all new permanent staff. When a DBS is accepted from another institution this will be logged on the SCR (with the DBS certificate number and the date that confirmation of the current DBS is seen) with further information detailed in the notes.

- DBS / CRB disclosure number

As printed on certificate. The SCR therefore identifies the most recent date (and number) of a DBS check. Since our system maintains an audit trail of changes, any earlier certificate/number is recorded and it is good practice to make a note of the rationale for any new DBS check and details of earlier checks.

- Overseas criminal records or certificate of good conduct

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools. In addition, the School will make such further checks as it considers appropriate in order to verify a person's suitability to work with children due to them having lived or worked overseas prior to their being appointed to a position at the School. This is so that the School can check whether any relevant events occurred during any time spent outside the UK and consider them as part of the application process. Whether these checks are carried out is at the School's discretion. There is no mandatory period of time spent overseas which requires additional checks to be completed. The School will assess each applicant individually although we will usually undertake an overseas criminal records check / request a certificate of good conduct if a candidate has resided overseas for a period of 3 months, or longer, in the five years prior to applying for a position at the School (taking into account NSPCC guidance (see Paragraph 232-6 of the ISI Integrated Handbook). It may be necessary to obtain further references or carry out additional overseas checks if an applicant has spent a longer period of time living or working overseas at any point. The date of receipt of the overseas criminal records check / certificate of good conduct must be logged with additional information in the notes if necessary.

- Prohibition from teaching check (Prohibition Order)

This is required for anyone employed to carry out teaching work* on or after 1 April 2012 (NB original guidance stated April 2014 but ISI Update January 2015 confirmed that "The date of 1 April 2012 is when the underlying legislation was effective and the DfE has now confirmed that this is the date from when checks should be carried out"). For teaching staff this details the date that confirmation was received from the National College of Teaching and Leadership (NCTL) that the applicant is not subject to a prohibition order. The School carries out these checks via the Employer Access Online Service.

*Teaching work is defined to encompass: Planning and preparing lessons and courses for pupils; delivering and preparing lessons for pupils; assessing the development, progress and

attainment of pupils, reporting on the development, progress and attainment of pupils. The School will carry out prohibition checks for all teachers. For those who are not employed specifically as teachers, the School will decide on a case by case basis, taking into account the individual roles, as to whether or not a prohibition check is appropriate.

- Prohibition from management (Section 128 Direction)

The School will check whether applicants appointed to management positions are subject to a Section 128 Direction. (This is a direction made by the Secretary of State under s. 128 of the Education and Skills Act 2008 barring individuals from taking part in the management of an independent school).

The scope of the barring directions (as detailed in the DfE's confirmation letter of 11 August 2015) covers governors, and all staff positions as follows: head teacher, any teaching positions on the senior leadership team, and any teaching positions which carry a department headship. Other teaching posts with additional responsibilities do not count as "taking part in management"). For non-teaching staff, only posts which are part of the senior leadership team should be regarded as "management" for the purposes of checking for the existence of the barring direction.

The checks will be made via either the DBS route or via the NCTL Employer Access Online service (as per DfE guidance dated 11 August 2015). As of 11 August 2015 no directions under s.128 had been made by the Secretary of State so all those appointed prior to this date and in positions of management (as defined above) have "YES" to the check being clear entered as at 12 August 2015. Those appointed after 12 August 2015 and in positions of management have been checked via either the DBS or NCT route for a s. 128 direction and also had "YES" to indicate check is clear. All those not in a position of management have N/A entered.

- Disqualification by Association (Childcare (Disqualification) Regulations 2009)

The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare. Previously this disqualification also extended to risk by association of anyone living within the same household and required us to carry out a self disclosure process with staff.

The risk by association element of the Act has now been refocused by the DfE and no longer applies to school staff.

We will continue to check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.

Relevant staff are required to read and complete a declaration confirming that they are not disqualified under these Regulations from working at the School

- Right to work in the UK

In most cases this will be confirmed by provision of an EEA/EU passport or current visa demonstrating right to work in the UK. If confirmation is anything other than an EEA/ EU passport then details must be entered in the notes.

- National Insurance number*

For employees who are not able to apply for an NI number until they are resident in the UK, this information will be added as soon as evidence of the NI number is provided.

- Two references obtained*

Two written references are required. Should the written references not be received prior to the start date then a verbal reference must be taken and logged in the notes in the SCR. The written reference must then be submitted as soon as possible and the date this is then received logged in reference fields with additional information entered in the notes.

- Full employment history with explanation of any gaps*

Confirmation that any gaps have been explained and checked by the School. Date confirmed and initials of checker are entered on the SCR.

- Medical fitness*

A declaration is required from all staff, duly signed, that they know of no reasons, on grounds of mental or physical health, why they should not be able to discharge with due care and skill the responsibilities required by the post in question. The date that the medical declaration is received is logged on the SCR (and must be received prior to employment commencing). Staff must also complete a medical questionnaire prior to appointment. In the event that any The completed medical questionnaire will be considered by the School's doctor (or a nominated locum), who highlights any area of concern to the HR department. In the absence of any substantive concerns precluding appointment, the date of receipt by the HR department of the doctor's confirmation that the medical questionnaire has been checked is logged under the comments column.

- Child Protection induction training carried out*

New staff, including temporary staff and volunteers, and Governors will receive training on appointment as part of their induction, overseen by the Designated Safeguarding Leads (DSL), which includes: The Safeguarding and Child Protection Policy, Code of Conduct, the identity of the DSLs and deputies, a copy of Part One of KCSIE, a copy of "What to do if you're worried a child is being abused" and a copy of the Whistleblowing Code. All staff will be required to sign to confirm that they have understood this information. The CP induction training will be carried out by the DSL. The date of the induction training should be entered on the SCR.

- Confirmation of receipt of CP policy and KCSIE, Part 1 and Annex A*

All staff sign to confirm that they have received the Safeguarding and CP policy and KCSIE, Part 1. On receipt of the signed declaration the date of signing is logged on the SCR. This process will be repeated as necessary to confirm receipt of updated documents. For new staff this form is provided at the CP induction (see above).

- Child Protection Training level 1 and 2 undertaken (and date)*

All staff (including the Headmaster and Governors) will receive the appropriate level of child protection training (Level 1 or 2 dependent on role within the School) that is updated regularly, and at least every 3 years, in accordance with Hampshire Safeguarding Children Board guidance. The date of this training is logged on the SCR. For DSLs and the CP Governor (and any other staff who have undertaken it as part of continuous professional development, level 2 and 3 training is also logged.

- Child Protection Training level 1 and 2 renewal date*

Level 1 (and Level 2 for teaching staff) CP training should be renewed every 3 years. The SCR will be used to show when an individual's renewal training is due. Renewal training for Level 3 is also logged on the SCR but with a biennial renewal date.

- Safer Recruitment Training*

As per the Safer Recruitment Policy, at least one member of every appointment panel will have received safer recruitment training. In addition, any member of staff responsible for assessing pre-employment checks will have received the relevant training. The dates off Safer Recruitment Training will also be logged on the SCR to identify which staff have received the appropriate training.

- Miscellaneous Safeguarding Training*

Record of any additional safeguarding related training that has been undertaken.

- Notes/Comments

Referred to above. The comments field will include additional relevant comments, eg overseas checks, date medical form returned from doctor, date written reference received if verbal in place on start date, etc. Risk Assessments put in place where original DBS certificates have not been seen prior to work commencing are also detailed under the notes.

Administration of the SCR

The regulations do not specify the required format for the register but specify that all the required fields should have suitable entries as far as this is possible. Not applicable (N/A) should be entered on the SCR if a particular check was either not relevant to the appointment in question or was not a requirement at the time of the person's appointment. The SCR should only show records for current staff. However, ISSRs updated in January 2015 states "in order to ensure that records are readily available for inspection purposes, schools are requested not to remove records of those no longer employed or volunteering until the end of the School academic year". Therefore once staff have left their entry is changed to "Archive" to identify that they are no longer employed but the entry will not be removed until at least the end of the relevant academic year.

The SCR is held electronically as an Access database. The HR and Compliance Manager is responsible for the completion and logging of entries on the SCR. School personnel authorised to access the SCR are the HR and Compliance Manager, Head's PA, Bursar, Headmaster, DSL if not the Headmaster, and Deputy DSL.

Categories of Worker logged on the SCR

The following categories of workers are recognised on the SCR:

- Teaching Staff (whether temporary or permanent)

All columns to be completed

- Support Staff

All columns to be completed with N/A to be logged in Prohibition from teaching column.

- Volunteers

The arrangements for volunteers will vary by individual and activity. The checks necessary will depend on whether the volunteer will be in regulated activity. With effect from 1 April 2015, there is no longer a general requirement to include volunteers on the SCR but where checks are carried out on volunteers these will be still be recorded on the SCR.

- Visiting Speakers

Refer to the School's Visiting Speaker policy as arrangements and information recorded will vary by way of individual and activity. A list of Visiting Speakers with risk assessments will be

maintained by the DSL. If it is identified that additional vetting checks are required then these will be recorded on the SCR.

- Visiting Music Teachers

Visiting Music Teachers are self-employed but subject to the same checks and vetting processes as the School's support staff.

- Supply / agency staff (including contractors in regulated activity)

The SCR must contain the following entries for supply / agency staff:

- Date of written notification from the supply agency that it has made checks of:
 - Identity
 - Children's Barred List Qualifications
 - Overseas checks, where applicable
 - Prohibition from teaching check, where applicable
 - Prohibition from management check, where applicable
 - Right to work in the UK
 - DBS certificate
- Date original DBS certificate was seen by the School
- Date ID verified by the School.
- Gap assistant, coaches and sports assistants

Assistants are employed by the School and are therefore subject to the same checks and vetting processes as the School's support staff.

- Self-employed Contractors

As they are usually individuals and not via agencies then the School carries out vetting checks that are appropriate for support staff.

- Governors and Chair of Governors

The following checks are carried out and logged on the SCR for governors and the Chair of Governors:

- Enhanced DBS Disclosure
- Identity
- Overseas checks where appropriate
- Right to work in the UK (see para 246 of the ISI regulatory requirements re this check)
- Dates of child protection training.

NB For the Chair of Governors the Secretary of State makes the following checks:

1. An enhanced criminal record check, countersigned by the Secretary of State;
2. Checks confirming the individuals identity and their right to work in the UK; and
3. In the case of an individual for whom, by reason of that individual living or having lived outside the UK, obtaining an enhanced criminal record certificate is not sufficient to establish the individual suitability to work in a school, such further checks as the Secretary of State considers appropriate.

- Host families

There is no requirement to log host families on the SCR. Host family details, along with DBS certificate numbers will be held in the separate host family folder within the HR Department.

Reviewing the SCR

A member of the Governing body will review entries and carry out spot checks on the Single Centre Register at regular intervals to check compliance with this guidance document. The outcome of such reviews will be reported to the Governing Body. Any deficiencies or weaknesses will be remedied without delay and reported as having been rectified to the Governing Body.