



RECRUITMENT AND SELECTION POLICY

Document last updated:	March 2026
Approved by:	HR Director
Due for review:	Summer 2026
Regulatory Compliance	Keeping Children Safe in Education (2025) Education (Independent School Standards) Regulations (2014) National Minimum Standards for Boarding Schools (2022)
Publication	SharePoint; external website

Contents

1. Our Philosophy.....	2
2. Policy aims	2
3. Pre-employment checks	3
4. Our recruitment processes	3
5. Data protection.....	10
6. Queries.....	11
Appendix One – Pre-employment checks for applicants	12
a. Verification of your education and work history.....	12
b. Verification of your qualifications	12
c. Verification of your identity and right to work in the UK	12
d. References.....	13
e. Verification that you are not prohibited from teaching in the UK or overseas	15
f. Verification that you are not prohibited from holding a management role.....	15
g. Online search.....	16
h. Relevant criminal records checks within the UK and overseas	16
i. Verification that you are not barred from working with children	18
j. Verification of your medical fitness.....	19
k. Other checks as applicable to the role and the circumstances	19
m. Other checks applicable to Senior Managers of a charity.....	20
Appendix Two - List of valid identity documents.....	21
Appendix Three – The definition of ‘extremism’	23
Appendix Four – The definition of ‘teaching work’	24
Appendix Five – The definition of ‘Regulated Activity’	25
Appendix Six – DBS Checks and DBS Filtering Rules	26
Appendix Seven - Checks for Agency Workers, Self-Employed Staff and workers, and Third Party Staff (Contractors).....	31
Appendix Eight - Checks for Volunteers	34
Appendix Nine - Checks on non-employed residents.....	35
Appendix Ten - Policy on the recruitment of ex-offenders	36

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

1. Our Philosophy

Eton College (the “College” or “we”) is committed to promoting the best habits of independent thought and learning in the pursuit of excellence. We aim to enable everyone, pupils and staff, to discover their strengths and make the most of their talents within the College and beyond. There is no ‘typical Etonian’, likewise there is no typical member of Eton College staff. We value individuality, difference, teamwork and the contribution everyone makes to the life of the College.

We aim to provide high standards of professional recruitment practices. We believe in fair and equitable selection procedures, and in appointing the best employee for the job. Our recruitment is based upon an applicant’s abilities, skills, experience and potential, to help deliver on our philosophy, and to make a positive contribution to the College and its pupils.

All job applicants must be considered equally and consistently. We do not discriminate on any grounds including, but not limited to, disability, sex, gender, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, age, sexual orientation, marital or civil partnership status, parental status, pregnancy or maternity, caring responsibilities or social background. We are committed to continuously improving inclusion throughout the organisation. The College’s Equality and Inclusion Policy can be found on our website on our intranet (Firefly/Atlas) or can be obtained from the HR team via recruitment@etoncollege.org.uk.

2. Policy aims

The aim of this policy is to provide a framework to help ensure the fair treatment of applicants throughout the recruitment process and meet the legal and regulatory requirements of recruitment and selection. We wish to provide consistency and transparency for hiring managers, and those being hired.

All employees involved in recruitment and selection activities are responsible for familiarising themselves with, and adhering to, the guidance provided by this policy.

These guidelines will be regularly reviewed to ensure they continue to reflect legal and regulatory obligations, and the needs of both the College and applicants. This policy does not form part of any employee's contract of employment, and the College may amend it at any time.

If you have any questions regarding the content of this policy, please contact a member of the HR team using recruitment@etoncollege.org.uk.

3. Pre-employment checks

As a school we are legally required to comply with a variety of specific recruitment and pre-employment checks to ensure that we appropriately safeguard the pupils in our care. This includes requirements outlined in relevant legislation, recommendations and guidance published by the Department of Education, such as: Keeping Children Safe in Education (KCSIE) as updated periodically, the Prevent duty guidance for England and Wales 2023 (see Appendix Three for further information), and any guidance or code of practice published by the Disclosure and Barring Service (DBS). We are also required to comply with the Education (Independent School Standards) Regulations 2014 and the National Minimum Standards for Boarding Schools (2022).

Further details of these can be obtained from the HR team via recruitment@etoncollege.org.uk.

The Eton College Safeguarding (Child Protection) Policy is available on our website, on our intranet (SharePoint) or can be obtained from the HR team via recruitment@etoncollege.org.uk.

4. Our recruitment processes

We employ approximately 1,250 people in a variety of different jobs and as a result, the application process will vary depending on the type of role and the skills we are looking to recruit. The majority of the pre-employment checks, however, will remain the same.

All roles which are open to external applicants can be found on the careers section of our website, along with the corresponding job description and person specification. If you already work at the College you will have access to view these roles via the weekly recruitment email.

In limited circumstances roles may only be open to internal candidates, such as in the event of a restructuring or another appropriate reason. Additionally, there may be circumstances in which the College legitimately and for good reason appoints an internal candidate to a role without advertisement of the role or a competitive process, such as where that is appropriate with reference to its obligations under equalities legislation.

Please be aware that we are very unlikely to accept speculative CV's or job applications, however, you can register your interest in working for the College and sign up for job alerts via our careers website.

4.1 Authorisation to recruit

- Approval to recruit must be given by the relevant member of the Leadership Team before a role can be advertised. This is to ensure College budgets are adhered to and a formal role review has taken place.
- Job descriptions must be completed by Hiring Managers, and must include the required skills and competencies for the role. The job description is expected to provide an accurate representation of the duties attaching to the vacant post.

In drawing up the job description and conditions of service, consideration must be given to the College's commitment that to encourage equality and diversity among our workforce and eliminate unlawful discrimination. For support in ensuring that job descriptions and conditions of service are not discriminatory please contact a member of the HR team using recruitment@etoncollege.org.uk.

- Attention should be paid to the language used within job descriptions, and to this end a linguistic decoding tool may be used.
- When using recruitment agencies or other recruitment suppliers, only those who have been approved in advance by the HR team, and who have demonstrated a commitment to our guiding principles can be used. Under no circumstances should a Hiring Manager directly engage a supplier, unless prior authorisation has been given by the HR team.

- We expect all Hiring Managers to undergo appropriate training when requested. This is to ensure those involved in the recruitment and selection process are cognisant of our recruitment policies and procedures and commit to minimising bias wherever possible.

4.2 Advertising roles

- Attempts will be made to advertise vacancies using diverse channels and the College will avoid using media which, because of their particular source of applicants, it is believed provides only or mainly applicants from a particular group.
- Vacancies which are open to external candidates will be posted on the College website. Internal candidates are welcome to apply for any posted vacancies.
- We may, on occasion, decide to restrict roles to internal candidates only. Information about internal and external vacancies is shared in the weekly Recruitment Roundup email. Where vacancies are for internal candidates only, this will be made clear within the Recruitment Roundup. Internal candidates will be selected for interview on the same basis as external candidates.
- Employees on any form of family leave should have access to advertisements for posts at Eton during their period of maternity leave – this may be by way of the Recruitment Roundup, the external website, or via communication from their line manager.

4.3 Applications and shortlisting

- Applications should be made through the College's Applicant Tracking System, Tribepad. Consideration will be given to those candidates who need support completing an application and contact details will be provided for any queries.
- Candidates should be provided with a job description, any supporting documentation, and an outline of the key conditions of service. If known, an indication of the date (or week) interviews will be held should be provided.
- As part of the application process (although not necessarily within the initial form) candidates will be asked to share:
 - personal details including current and former names, their current address and national insurance number;
 - details of their present (or last) employment and their reasons for leaving;

- their full education and employment history, including reasons for any gaps in employment;
 - qualifications (awarding body and date of award) where relevant; and
 - candidates for pupil-facing roles will also be asked for details of their referees during the application process.
- A shortlist of candidates will be drawn up for interview based on merit and suitability for the post with reference to the job description. Wherever possible, shortlisting should be carried out by more than one person and all applicants must be considered equally and consistently in the shortlisting process.
 - Appropriate and complete records of the shortlisting process must be kept and given to the HR team after the shortlisting process has concluded and will be kept for 12 months before being confidentially destroyed.
 - Shortlisted applicants will be asked whether there are any reasonable adjustments needed for them to both attend an interview and fully participate in that interview (or other selection process).
 - Shortlisted candidates will also be asked to complete a self-declaration of their criminal record, or any information that would make them unsuitable to work with children.
 - Other than in exceptional circumstances, reasonable notice will be given to allow candidates sufficient time to prepare for and make the necessary arrangements to attend the interview (interviews may also be conducted online).
 - In addition to interviews, a range of other selection techniques such as skills testing, verbal and numerical reasoning tests and interactive activities may be used, including where to do so would amount to a reasonable adjustment to allow the participation of a candidate. In such circumstances, reasonable notice and relevant information will be provided to allow candidates sufficient time and information to prepare.

4.4 Selection methods

- Interviews will normally be held by a panel comprising of a minimum of two people, except in the case of final stage ‘safeguarding interviews’ which are normally held one-to-one. Interviewers should encourage candidates to be at ease during the interview, allowing them to give a fair and accurate impression of themselves.

- Before job offers are made, all successful applicants will be interviewed regarding their suitability to work with children (the 'safeguarding interview'). This may happen at the first stage of the interview process or later in the process, depending on the role applied for.
- A consistent and structured interview should be used to reduce the risk of bias and to allow for a consistent candidate experience. Interview questions should be agreed by the interviewer(s) in advance and will be developed from the current job description for the post and desired competencies. The same interview format and questions should be used for all candidates .
- Every effort should be made by all interviewers to take concise, accurate and impartial notes to ensure a transparent and clear basis for decision making. These must be given to the HR team after the interview process has concluded and will be kept for 12 months before being confidentially destroyed.
- We recognise that an interview is a two-way process and, wherever possible, candidates will be given the opportunity to view the areas within which they would work. We should encourage candidates to ask questions about the College and the role for which they are applying to help them develop a good sense of whether they would like to work with us.
- Where selection tools other than interviews are used, these selection tools should assess job relevant criteria and should be chosen on the basis of their ability to predict performance. In choosing such selection tools consideration will be given to any potential adverse impact on protected groups.
- Those involved in the selection process are encouraged to question and challenge hiring decisions with one another and are expected to take appropriate time for decision making.
- All interviewed candidates should be notified of the outcome of the selection process as soon as reasonably possible. Feedback will also be offered.
- Keeping Children Safe in Education states that schools should take up references before interview if possible. The College therefore seeks references in advance of interview for applicants for roles which involve working closely with pupils (for example our teaching and pastoral roles). Where this is required, candidates will be made aware

during the application process. The College also makes a significant number of appointments into roles which do not involve working closely with pupils. For these roles the College will always take up references before employment can commence but will not ordinarily seek references before interview.

- In line with Keeping Children Safe in Education, the College will carry out an online search as part of its due diligence on candidates. This helps the College identify any incidents or issues that have happened, and are publicly available online, which the College might want to explore with the applicant.
- Members of recruitment panels must have satisfactorily completed training in 'Safer Recruitment' practices for schools to help make sure applicants are suitable to work with children.
- All interviewees must present their identity documents in person to their interviewer (see Appendix Two), so their identity can be verified.

4.5 Pre-employment checks

Any offers of direct employment are conditional upon satisfactory pre-employment checks as set out in Appendix One. Please be aware candidates cannot start work until these checks have been received and verified¹. This checking process will usually be completed by our HR team or, in some cases, by an external provider specifically engaged to support the College with elements of our pre-employment checking process. Managers must not appoint or seek to appoint any candidate without appropriate pre-employment checks being completed and no expectation should be raised with any candidate that this is a possibility.

The pre-employment checks that we will complete before an individual can start with the College are mandated by government legislation and are as follows (for a detailed explanation of each check please see Appendix One):

- verification of full education and work history (since leaving school, including education employment and voluntary work);

¹ If all of other checks have been received and are considered to be satisfactory and the DBS check or overseas police check has been applied for, we may be able to complete a risk assessment to allow the candidate to start before the DBS certificate or overseas police check has been received. Please be aware, this is only possible for certain roles and in rare circumstances.

- verification of qualifications;
- verification of identity and right to work in the UK;
- verification and receipt of a minimum of two written references (one from the candidate's current employer and one from the last time they worked with children, if not currently working with children and they have worked with children previously);
- a check of medical fitness to perform the role (this check is completed in accordance with the Equality Act 2010);
- verification that the candidate is not prohibited from teaching in the UK or overseas (relevant roles or previous teaching experience only);
- verification that the candidate is not prohibited from holding a management role (relevant roles only);
- a satisfactory online check;
- receipt of a criminal records check from the Disclosure and Barring Service;
- overseas criminal records check (if required);
- verification that the candidate is not barred from working with children (if the role amounts to regulated activity – see Appendix Five);
- verification that the candidate is not prohibited from acting as a trustee or senior manager of a charity (relevant roles only).

We reserve the right to complete other checks as applicable to the role and circumstances.

We have a duty to ensure that all individuals engaged by the College are suitable to work in a school environment. As such relevant pre-employment checks will also be performed for contractors, supply staff, agency workers, self-employed individuals and volunteers. For more information about this, please see Appendices Seven and Eight.

For those offered employment and accommodation with the College, members of their family may also be subject to criminal records checks. Please be aware, these checks will need to be considered satisfactory to the College before these family members are allowed to move into College accommodation. For further details, please see Appendix Nine.

We are an organisation which aims to recruit on the basis of merit and ability. If a candidate has a criminal record, this will not automatically bar them from employment at the College,

but each case will be judged individually, in accordance with the objective assessment criteria set out in Appendix Ten.

4.6 Offers of employment

A contract will be supplied to successful candidates as soon as practicable, along with clear communication, contacts and obligations regarding signing.

4.7 Providing references

Any Eton employee who is approached directly to provide a reference for a current or former member of staff must refer to the Employment Reference Policy (available on SharePoint or from the HR team), prior to completing a reference.

5. Data protection

The College complies with the Data Protection Act 2018 and the General Data Protection Regulation and processes all personal data in accordance with its Privacy Notice. The Privacy Notice is available to view on our website, and can also be printed and sent to candidates on request.

We have a statutory and moral obligation to carry out the pre-employment checks detailed within this procedure. To enable us to complete these checks employees and prospective employees will be required to provide certain information to the College. We will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and Teaching Regulation Agency (previously known as the National College for Teaching and Leadership), and third parties whom we contract with to provide pre-employment checking services.

Failure to provide the requested information may result in the College not being able to meet our employment, safeguarding or legal obligations. Therefore, if we, or our third-party suppliers, are not provided with the requested information, we may not be in a position to offer employment.

In order to meet our commitment to providing an ever more inclusive workplace, candidates may be asked to complete a recruitment monitoring questionnaire. All completed monitoring forms will be treated as confidential. This data will be separated from the application on receipt, and those involved in the selection process will not have access to it. The information given by candidates will be solely used for the purpose of benchmarking and helping us improve the recruitment process.

6. Queries

If you have any questions or queries about any of the details contained within this policy, please contact recruitment@etoncollege.org.uk

Appendix One – Pre-employment checks for applicants

a. Verification of your education and work history

It is an essential part of our checking process that we understand the full work and academic background of all candidates who apply to work at the College. This is irrespective of the role applied for. To make sure we understand your full work and academic history we will ask you to complete relevant paperwork during your application process and this will be reviewed with you. If there are any gaps in your employment or academic history these need to be listed on the form and explained to us - for instance gaps could include extended travel abroad between school and starting a job (i.e. a 'gap year'), being unemployed for a period of time, or taking time out of the workplace to look after a dependent etc. If you have spent time living or working abroad, please remember to tell us which countries you visited and how long you were there for.

Please be aware that as part of the application process the College will need to know, and see proof of your date of birth. This is necessary so that we can verify your identity (please see section c below) and check for any unexplained discrepancies in your employment and education history. We are an equal opportunities employer and do not discriminate on the grounds of age.

b. Verification of your qualifications

If we have listed specific professional or academic qualifications within the job description or during the recruitment process as being required for the role, or if you have listed qualifications as part of your application (whether or not they are required for the role) the College will need to verify that you have these qualifications. To do this we will need to see original copies of certificates and we may also contact the awarding body to confirm that the qualifications were awarded.

c. Verification of your identity and right to work in the UK

We need to verify that you are who you say you are, and that you also have the right to work in the UK. We will also use these documents for the DBS checking process (outlined in section 3g).

To verify your identity and right to work in the UK we need to see at least three identity documents. These documents are those used by the DBS checking authority (see Appendix Two). These must be a mixture of 'primary identity' documents (Group 1 documents), 'trusted government documents' (Group 2A documents) and 'Financial and Social History documents' (Group 2B documents). The College will need to see:

- one document from Group 1; and
- two further documents from either of Group 1, Group 2a or Group 2b, one of which must verify your current address.

Wherever possible, we will need to see your birth certificate. In addition, if you have changed your name during the course of your life (for example as a result of marriage, adoption or a statutory declaration) we will also need to see documentary evidence of this change. This may, for instance, be in the form of a marriage certificate, adoption certificate or formal confirmation from deed poll.

More information about the types of identity documents we can accept, and what documents are included in groups 1, 2a and 2b, is outlined in Appendix Two.

d. References

All offers of employment are conditional on the receipt by the College of a minimum of two written references, the content of which must be considered to be satisfactory by the College:

- One reference must be from your most recent employer (if the College is your most recent employer, a reference may be taken from your line manager);
- If you do not currently work with children but have worked with children in the past (however long ago), one of the two references must be from that employer.

Please be aware that your referees cannot be a relative or someone known to you solely as a friend or colleague. References need to be from a senior person within an organisation who has the appropriate authority and knowledge to provide a reference for you, and need to be provided on a professional email address. If the reference is provided by a school or college then it must be confirmed by the headteacher/principal as accurate.

All referees will be asked whether they believe that you are suitable to undertake the role which you have applied for, and whether they have any reason to believe that you are unsuitable to work with children. Current and previous employers will also be asked to confirm the following:

- Your dates of employment.
- Your job title and duties.
- Your disciplinary record, including whether you have ever been the subject of disciplinary 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.
- Whether any allegations have been raised about you that relate to the safety and welfare of children or young people, or behaviour towards children or young people, except where allegations or concerns were found to be false, unsubstantiated or malicious.
- Your reason for leaving.

We are aware that it is the policy of some employers to only provide a factual reference (e.g. job title and dates of employment). If your referees only provide such references you may be disadvantaged and we will need to ask for additional references before your appointment can be confirmed.

Please be aware that the College can only accept references obtained directly from the referee – we cannot rely on references or testimonials provided by you, or on open references or testimonials. Electronic references will be verified to confirm that they originate from a legitimate source. At the College's discretion, we may contact a referee by phone or email to verify the details provided within the reference.

References will be compared with information you have provided as part of your application, and any discrepancies or inaccuracies will be considered by the College and addressed with you and/or the relevant referee. For instance, you and/or your referee may be asked to provide further information, evidence or clarification.

e. Verification that you are not prohibited from teaching in the UK or overseas

In line with the Education (Independent School Standards) Regulations 2014, if you intend to carry out 'teaching work' for the College we will need to check that you are not subject to a prohibition order that prevents you from doing so. The definition of teaching work is not confined to classroom teaching, it also includes coaching sport and games, and other activities such as working in our Combined Cadet Force. The test we use to determine whether a role involves 'teaching work' is outlined in Appendix Four.

We use the UK Government's 'check a teachers record' system to check whether successful job applicants are the subject of a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the Teaching Regulation Agency in the UK. We will also ask you to declare whether you have ever been referred to, or are the subject of, a sanction, restriction or prohibition issued by the Teaching Regulation Agency or other equivalent UK body.

If you have been offered a teaching role at the College and you have taught in a school overseas (as opposed to work coaching, working on a Summer School, tutoring etc.) we will check whether you are subject to an overseas teaching sanction. To do this we will ask you to provide proof of your past conduct as a teacher, issued by the professional regulating authority in the country/countries in which you worked. We may also seek an additional reference from the school where you worked.

Please be aware, if you are not currently prohibited from teaching but you have been the subject of a referral to, or a hearing before the Teaching Regulation Agency (or other equivalent body) whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, we will consider whether the facts of the case render you unsuitable to work at the College.

f. Verification that you are not prohibited from holding a management role

If you have applied for a senior management position we are required to check that you are not subject to a direction under Section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts you from being involved in the management of an

independent school. For clarity, we are required to check both external and internal candidates.

We can obtain this information either through declarations on an Enhanced DBS Certificate or through the from the UK Government's webpage: [Individuals prohibited from managing or governing schools - GOV.UK](#). We will use either or both of these methods to obtain this information.

Please be aware, if you are not currently prohibited from management, but you have been the subject of a referral to, or hearing before the Department for Education or other appropriate body, whether that resulted in the imposition of a Section 128 direction or other sanction, or where a Section 128 direction or other sanction has lapsed or been lifted, we will need to consider whether the facts of the case render you unsuitable to work at the College.

g. Online search

In line with Keeping Children Safe in Education, we will perform an online search as part of the pre-employment checking process for all of our roles.

If you have applied to work in a pupil-facing role (for example a teaching or pastoral role), this process will take place at the point you have been shortlisted for interview. If you have applied for a role which does not work directly with pupils, the online search will normally be completed prior to appointment.

Effective 1 March 2026, the College uses the online platform provided by Safehire.ai Ltd to undertake Surface and Dark Web background checks. This may help to identify any incidents, issues or concerns that are publicly available online, which we may want to explore with an applicant. To do this, the applicants full name, email address, phone number and address will be shared with Safehire.ai Ltd.

h. Relevant criminal records checks within the UK and overseas

If you are offered a role at the College (this includes roles in a volunteering capacity) you will be required to undergo a relevant police check. All applicants will require a UK police check,

and if you have worked or lived abroad (including extended holidays) in most cases we will also need to conduct an overseas police check.

For the vast majority of our roles the UK police check will be an Enhanced Disclosure from the Disclosure and Barring Service (DBS). The check is conducted at enhanced level when roles are considered to be engaging in 'regulated activity'.

- For more information about what constitutes regulated activity, please see Appendix Five.
- For more information about Enhanced DBS checks, and the current DBS filtering rules, please see Appendix Six.

DBS Checks:

The DBS will issue a disclosure certificate directly to you, this will not be sent to the College. However, it is a condition of employment that we view the original certificate therefore the HR team will arrange a suitable time with you to bring the certificate into the College. Applicants who are unable to attend to provide the certificate are required to send in the certificate by post and the original certificate will then be returned to you on your first working day.

If you have an existing enhanced 'portable' DBS which is registered to the DBS Update Service, it may be possible to use this as part of your recruitment checks. The College will need to see the original certificate and obtain your permission to verify the DBS on the DBS Update Service website, which will confirm whether the certificate is still current or if there is any additional information on it. The College may also carry out a separate Children's Barred List Check at this point. The results of both of these checks must be acceptable to the College.

If we applied for your DBS, your employment will remain conditional upon the original certificate being provided and it being considered satisfactory by us. We do not keep copies of the DBS certificate, but we do record the certificate number and date of issue for our records.

Overseas Police Checks:

We take into account relevant guidance issued by the NSPCC when deciding whether to request overseas information from applicants and reserve the right to ask you to apply for an overseas police check where you have previously lived or worked overseas. This will usually be where you have lived or worked overseas for more than three months during the last five years but may be requested in other cases, depending on the role applied for. We will assess each applicant's situation on its individual facts, taking into account any guidance issued by the Secretary of State.

If we require an overseas police check you will be notified by a member of the HR team. The process for undertaking overseas police checks varies depending on the country from which they are sought. In most cases you will need to complete additional forms which will need to be returned directly to the authorities in the relevant countries. Depending on the country, the outcome certificate of the overseas police check may be returned directly to you, or it may be returned to the College. In all instances we will need to see the original certificate before you are able to start work.

i. Verification that you are not barred from working with children

Children's Barred List checks are only available for applicants who will be engaged in regulated activity with children (for a full definition see Appendix Four). In practice, the majority of roles at the College are considered to be regulated activity. If you apply for a role which is considered to be regulated activity we are required to undertake a check of the Children's Barred List before you can start work. The Children's Barred List is a list of individuals who are barred from working with children and is maintained by the Disclosure and Barring Service.

Please be aware, if you are included on the Children's Barred List you will be breaking the law if you seek to work in regulated activity with children. Please be aware that we must make a report to the Police and/or DBS if we:

- receive an application from a barred person;
- are provided with false information in, or in support of an applicant's application; or
- have serious concerns about an applicant's suitability to work with children.

We will check the Children's Barred List either as part of an Enhanced DBS check, or as a separate Children's Barred List check (previously known as a List 99 check). It is at our discretion which option is chosen.

More information about regulated activity is included in Appendix Five.

j. Verification of your medical fitness

The Education (Independent School Standards) Regulations 2014 and Keeping Children Safe in Education require that the College must verify the medical fitness of anyone we appoint to ensure they are mentally and physically fit to perform the duties of the specified position. Please be aware, this will take place after an offer of employment has been made, but before the appointment is confirmed.

To determine medical fitness, we ask candidates to complete a health questionnaire. If you answer 'yes' to any of the questions in the questionnaire you will be required to complete a more detailed Pre-Placement Health Assessment form, which is reviewed by our independent occupational health advisor. The advisor will review your questionnaire against the job description and person specification for the role, together with the details of any other physical or mental requirements of the role (e.g. the proposed working hours, layout of the College etc.). If the advice from College's occupational health advisor calls in to question your fitness for the role we will discuss that with you and may, in our discretion, seek further medical opinions from a specialist or request that you undertake a full medical assessment.

Please be assured that we are aware of our duties under the Equality Act 2010, and we will not withdraw a job offer on the grounds of medical fitness without first consulting with you and considering reasonable adjustments and suitable alternative roles within the College.

k. Other checks as applicable to the role and the circumstances

In addition to the checks set out above, we also reserve the right to obtain such formal or informal background information about you as is reasonable in the circumstances to determine whether you are suitable to work with us. This may include credit checks (for example for Finance roles), driving licence checks through the DVLA (for driving roles) and internet and social media searches.

l. Other checks applicable to those who work as a Rowing Coach

If you have been appointed to a Rowing Coach position, we undertake a British Rowing prohibition check to understand whether you have been prohibited from involvement with British Rowing or whether there are any active disciplinary matters.

m. Other checks applicable to Senior Managers of a charity

If you have been appointed to a role on the Leadership Team we will need to check that you are not prohibited from acting as a trustee or senior manager of a charity. The Charities Act 2011 sets out the grounds on which a person can be disqualified from acting as a senior manager. These include various spent and unspent criminal offences and other sanctions. We will therefore check the following registers:

- The Insolvency Register;
- The register of disqualified directors maintained by Companies House; and
- The register of persons who have been removed as a charity trustee.

Please be aware that if you fail to disclose relevant information, or provide false information, about your ability to act as a charity trustee or senior manager of a charity this may amount to a criminal offence. It may also result in the withdrawal of any offer of employment.

All individuals on our Leadership Team also have an ongoing duty to inform the College if there is a change in their circumstances which may result in them becoming disqualified from acting as a senior manager of a charity.

Please be aware, a person who discloses that one or more of the disqualification criteria is applicable to them may apply to the Charity Commission for a waiver of the disqualification. However, we may, at our discretion, withdraw an offer of employment from a senior manager if a waiver application becomes necessary or is rejected by the Charity Commission. For clarity, we are not required to await the outcome of a Charity Committee waiver application before taking these steps.

Appendix Two - List of valid identity documents

Group 1: primary identity documents

- current valid passport
- biometric residence permit (UK) (can be used up to 18 months after the expiry date)
- e-Visa accessed via the 'View and Prove' service
- application registration card (ARC) issued by the Home Office
- current driving licence (photocard - full or provisional (UK / Isle of Man / Channel Islands)
- birth certificate - issued within 12 months of birth (UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces)
- adoption certificate (UK and Channel Islands)

Group 2a: trusted government documents

- current valid driving licence (photocard - full or provisional (all countries outside the UK excluding Isle of Man and Channel Islands)
- current valid driving licence (paper version – if issued prior to 1998; UK / Isle of Man / Channel Islands; full or provisional)
- birth certificate - issued after time of birth (UK, Isle of Man and Channel Islands)
- marriage / civil partnership certificate (UK and Channel Islands)
- immigration document, visa or work permit (issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa / permit must relate to the non-UK country in which the role is based)
- HM Forces ID card (UK)
- HM Armed Forces Veteran card (UK)
- fire arms licence (UK, Channel Islands and Isle of Man)

Group 2b: Financial and social history documents

- mortgage statement (UK)**
- bank / building society statement (UK and Channel Islands)*
- bank / building society statement (countries outside the UK – branch must be in the country the applicant lives and works)*
- bank / building society account opening confirmation letter (UK)*
- credit card statement (UK)*
- financial statement - e.g. pension, endowment (UK)**
- P45 / P60 statement **(UK and Channel Islands)
- council tax statement (UK and Channel Islands)**
- letter of sponsorship from future employment provider (non UK only; valid only for applicants residing outside the UK at the time of application; must be valid at time of application)
- utility bill (UK; not mobile telephone bill)*
- benefit statement - e.g. child benefit, pension (UK)*
- a document from central or local government/ government agency / local council giving an entitlement - e.g. from the Department for Work and Pensions, the Employment Service, HM Revenue & Customs, (UK and Channel Islands) *
- HMRC self-assessment letters or tax demand letters**
- European Health Insurance Card (EHIC) or Global Health Insurance Card (GHIC)
- EEA national ID card (must be valid at time of application)
- Irish Passport Card (cannot be used with an Irish passport)
- cards carrying the PASS accreditation logo (UK and Channel Islands; must be valid at time of applications)
- letter from Head or College Principal (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
denoted with *** - it should be less than 1 month old

Appendix Three – The definition of ‘extremism’

The College complies with the Prevent duty guidance and the definition of extremism as set out in Keeping Children Safe in Education (KCSIE).

KCSIE states:

"Extremism is vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of those with different faiths and beliefs."

The College is an equal opportunities employer and in fulfilling its Prevent duty obligations does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, gender reassignment, marital or civil partner status, pregnancy or maternity, disability or age.

Useful links:

Keeping Children Safe in Education is available to view via the UK government's website here:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Information about the Prevent duty is available via the UK government's website here:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Appendix Four – The definition of ‘teaching work’

Teaching work is defined in The Teachers’ Disciplinary (England) Regulations 2012 to encompass any of the following:

- planning and preparing lessons and courses for pupils;
- delivery of lessons to pupils;
- assessing the development, progress and attainment of pupils;
- reporting on the development, progress and attainment of pupils.

(‘Delivery’ includes delivering lessons through distance learning or computer-aided techniques).

None of these actions are considered ‘teaching work’ if the person carrying out the activity does so subject to the direction and supervision of a qualified teacher or a person nominated by the Head Master.

Appendix Five – The definition of ‘Regulated Activity’

Regulated Activity is defined in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012).

“Any position undertaken at, or on behalf of, the College 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 if it
- satisfies the "period condition", meaning 4 times or more in a 30 day period; and
- provides the opportunity for contact with children.”

It is for the College to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances. However, please be aware that the duties of nearly all posts at the College amount to regulated activity (including all activities relating to personal care, health care, the provision of advice or guidance for children on well-being and driving a vehicle only for children). Limited exceptions could include (but are not limited to) an administrative post undertaken on a temporary basis in the School Office outside of term time.

We are required to carry out an enhanced DBS check for all employees, supply staff and Fellows who will be engaging in regulated activity. However, we can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

Appendix Six – DBS Checks and DBS Filtering Rules

The Disclosure and Barring Service

The Disclosure and Barring Service (DBS) was established in 2012 and carries out the functions previously undertaken by the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA).

The DBS helps to prevent unsuitable people from working with vulnerable groups, including children. Safeguarding is at the heart of everything at the DBS.

The DBS is responsible for:

- processing requests for, and issuing, DBS checks for England, Wales, the Channel Islands and the Isle of Man;
- making considered decisions regarding whether an individual should be barred from engaging in regulated activity with children, adults or both, in England, Wales and Northern Ireland; and
- maintaining the children's and adults' barred lists

Information about the DBS can be found online here:

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

Disclosure checks (DBS checks)

The DBS disclosure team carries out criminal record checks that result in DBS certificates being issued to an individual. Employers can then ask to see this certificate to ensure that they are recruiting suitable people into their organisation.

There are currently three levels of criminal record check:

- basic check;
- standard check; or
- enhanced check (with or without barred lists).

The information contained on each type of check is different, as is the process for applying. The DBS break their checking service down into Basic, Standard and Enhanced checks. The

College only uses Enhanced checks as the majority of roles consist of at least some regulated activity with children.

Enhanced check

An enhanced DBS check is suitable for people working with children.

The certificate will contain the same details as a standard certificate and, if the role is eligible, an employer can request that one or both of the DBS barred lists are checked.

The certificate may also contain non-conviction information supplied by a Chief Officer, if they feel it is relevant and ought to be contained in the certificate.

An individual cannot apply for an enhanced check by themselves. There must be a recruiting organisation who needs the applicant to get the check. This is then sent to DBS through a registered body. The service is free for volunteers.

Barring

Where requested, an enhanced certificate will also include a check of one or both of the DBS barred lists. If an individual is listed, this will appear on their DBS certificate.

It is the responsibility of the DBS to maintain these lists. This involves making fair, consistent and thorough decisions that are appropriate to the behavior that has occurred and considering the risk of future harm.

People are brought to the attention of the DBS barring team in one of three ways:

- automatic barring offence – also known as autobar;
- disclosure; or
- referral.

Automatic – also known as autobar

This is when someone has been newly convicted or cautioned for a serious offence and they are considered for immediate barring, either with or without the opportunity to make representations. This information comes from the Police National Computer.

Disclosure

This is when someone applies for an enhanced DBS check to work with children or adults in certain circumstances, such as those in receipt of healthcare or personal care, and the check reveals relevant information that results in the individual being considered for inclusion on one or both of the barred lists.

Referral

This is when an employer, volunteer manager or other organisation has concerns that someone has either caused harm or has the potential to cause harm to vulnerable groups and submits a referral to the DBS.

Regulated activity providers (employers or volunteer managers of people working in regulated activity in England, Wales or Northern Ireland) and personnel suppliers have a legal duty to refer to the DBS where conditions are met.

DBS filtering rules

Since 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:

Those aged 18 or over at the time of an offence

An adult conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:

- eleven years have elapsed since the date of conviction; and
- it did not result in a custodial sentence; and
- it was not imposed for a "specified offence".

A caution received when a person was aged 18 or over for an offence committed in the United Kingdom will not be disclosed if six years have elapsed since the date it was issued, and it was not imposed for a "specified offence".

Those aged under 18 at the time of an offence

A conviction for an offence committed in the United Kingdom will be removed from a DBS disclosure if:

- five and a half years have elapsed since the date of conviction;
- it did not result in a custodial sentence; and
- it was not imposed for a "specified offence".

Cautions issued for an offence committed when a person was under the age of 18 are not automatically disclosed in a DBS certificate (and do not have to be disclosed by a job applicant).

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. A conviction for a "specified offence" will always be disclosed regardless of when the offence 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>

The DBS disclosure certificate

The DBS issues the DBS disclosure certificate to the person who is the subject of the check only, rather than to the College. It is a condition of employment with the College that the original disclosure certificate is viewed and recorded by us prior to starting employment.

A convenient time and date for bringing the certificate into the College should be arranged with the HR Department as soon as it has been received. In exceptional circumstances, and with the prior agreement of the HR team, the original certificate may be sent by recorded delivery to the HR Department. Original DBS certificates will be returned to you either once your employment with the College has started, or in advance of that date by way of recorded delivery, depending on the circumstances.

Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the College.

We do not keep copies of your DBS certificate, but we will record the certificate number and date of issue.

Appendix Seven - Checks for Agency Workers, Self-Employed Staff and workers, and Third Party Staff (Contractors)

Staff can come to us under arrangements other than direct employment, however, we still have a duty to ensure that these individuals are suitable to work within a school environment. If you are not applying for a direct position with the College, you may be engaged in one of the following ways:

Agency Worker:

Eton defines Agency staff as, persons supplied by a temping agency as a de-facto member of staff on a fixed term basis performing regulated activity. Agency workers can perform any function, for any department. The checks at Annex One apply to Agency workers as they would for direct employees (see above). The agency is required to provide us with written confirmation that the checks have been completed before an individual is allowed to start work. We will also need to see the original DBS certificate and photo ID on arrival.

Self-Employed Staff (paid by the College):

The College defines self-employed staff as, individuals who work for themselves, in business on their own account, but who have a direct agreement with the College to provide a service. The service they provide will often include an element of teaching, coaching, guidance or support of pupils and therefore will amount to regulated activity. Therefore the checks at Annex One apply to self-employed staff as they would for direct employees (see section 4.5 and Appendix One for more information).

Self-Employed Worker:

Eton defines a self-employed contractor as an individual who works for themselves (whether through a personal services company or otherwise) and is engaged under a contract to provide a service. The service they provide includes no element of instruction or guidance to pupils. They are required to undergo an enhanced DBS check (including a barred list check if the activity is regulated) and bring the original DBS certificate and their photo ID on arrival.

Third Party Staff

Keeping Children Safe in Education (KCSIE) allows schools discretion as to when 'third-party staff' who are not from an employment business (agency) are to be checked in line with agency workers and when they may be subject to the less stringent checks of 'contractor'.

Eton requires the most stringent checks to be carried out for employees of contractors working at the school on a long-term basis (i.e. for more than an academic year) with regular access to pupils (such as cleaners or caterers) weighing issues such as the role, supervision, access to pupils, age and the vulnerability of pupils.

Contractor - long term, regulated activity, regular contact with children

This is a someone who is likely to be engaged for a period longer than a year who has regular contact with pupils (such as catering staff or boarding house cleaners). This category of worker requires the same level of checks as Agency Workers and College employees. The checks should be undertaken by the contracting organisation and notified in writing to the HR Department. The HR team must be made aware in advance that you intend to engage a long term contractor who will have regular contact with children so the College can work with the contracting organisation to ensure the correct checks are performed.

Contractor - regulated activity

This is a contractor who falls within the definition of regulated activity, but who does not work directly with children. They require an Enhanced DBS certificate with Children's Barred List check. They will require a check of identity documentation on the first day, along with any role specific checks (such as qualifications or professional memberships etc). The checks should be undertaken by the contracting organisation, and notified in writing to the College. The Eton employee who receives this notification must ensure they pass it to the Security team as soon as possible and in all circumstances before the contractor's first day of work. In some instances, where the contracting organisation is unable to process a Barred List Check, the Security team may be able to perform this check on the contracting company's behalf.

Contractor - not in regulated activity

This is a contractor who does not fall within the definition of regulated activity, but who still needs to work unsupervised around the College due to the nature of their work, such as

occasional Freelancers within the Farrer Theatre who are not self employed. They require an Enhanced DBS certificate (without a Barred List Check) . They will require a check of identity documentation on the first day, along with any role specific checks (such as qualifications or professional memberships etc). The checks should be undertaken by the contracting organisation and notified in writing to the College. The Eton employee who receives this notification must ensure they pass it to the Security team as soon as possible and in all circumstances before the contractor's first day of work.

Occasional contractor

This is a contractor working at the College for 3 days or less in a 30-day period. The nature of their work means they will be supervised throughout their time working at the College. No checks are required on this category of contractor, however, identity must be checked on arrival by the individual engaging the contractor to ensure the correct person has arrived under the terms of the contract.

Contractors working outside of the half or on a closed site

No checks are required on these individuals as there is no opportunity for contact with Eton College pupils. However, if they require access to keys or College machinery then a Basic DBS certificate will be required. The contracting organisation will need to arrange for the DBS and a copy must be shown to the Security team.

Appendix Eight - Checks for Volunteers

The types of checks we complete for volunteers depends on whether the role they perform is considered to be regular.

Volunteers undertaking regular activity that will bring them into contact with pupils - we will undertake an enhanced DBS check including a Children's Barred List check, ask them to sign a volunteer agreement and ensure a member of the HR team checks their DBS certificate and photo ID prior to them volunteering.

Less frequent volunteers (unpaid assistance for less than a day and therefore do not have regular contact with pupils) – no checks are required, but they must be supervised at all times.

Under no circumstances will we permit an unchecked volunteer to have unsupervised contact with pupils.

All volunteers will also be subject to a check of their identity, and we reserve the right to obtain such further suitability information about a volunteer as we consider appropriate in the circumstances. This may include, but is not limited to, the following:

- formal or informal information provided by employers, parents, and other volunteers;
- character references from the volunteer's place of work or any other relevant source;
- an informal 'safer recruitment' interview; and
- a reputational search across social media.

We need to undertake a new DBS check each time you volunteer if you haven't been involved in volunteering activities for three consecutive months or more. Therefore, if you volunteer regularly with the College we will request that you sign up to the DBS update service, so that criminal record checks can be performed for you as quickly as possible.

Appendix Nine - Checks on non-employed residents

The College is a full boarding school and we accommodate a large number of our employees and their families. If you are accommodated by the College, members of your family may also be subject to criminal record checks. Please be aware that these checks will need to be satisfactory to the College before members of your family are allowed to move into College accommodation.

For those living in boarding houses

All persons aged 16 and over (not employed by the College) who live on the same premises (or have unrestricted access to the same premises) as our pupils are required to undergo an enhanced DBS check with Children's Barred List information. We will also obtain an overseas police check from any country they have lived or worked in for three months or more during the last five years. There are separate rules for occasional visitors to boarding accommodation, which are set out in our Visitor Policy.

Each non-employed resident aged 16 or over will also be required to sign a written agreement specifying the terms of their accommodation, guidance on contact with boarders, their responsibilities to supervise occasional visitors, and notice that their permission to live in College accommodation may be rescinded if we believe that they are unsuitable to have regular contact with our pupils.

They will also be required to notify the House Master or Deputy Head (Boarding) if they are charged with or convicted of any offence.

Appendix Ten - Policy on the recruitment of ex-offenders

Our philosophy

We make all appointment decisions on the basis of merit and ability. If you have a criminal record this will not automatically bar you from employment at the College; instead each case will be judged individually, having regard to the criteria set out below.

What you must declare

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

We encourage you to declare as much information as possible to us, as having a previous criminal record will not automatically prevent you from working here. However, a failure to disclose a previous conviction (which should always be declared) may lead to your application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for the College to employ anyone who is barred from working with children. It is also a criminal offence for any person who is barred from working with children to apply for a position at a school. We must make a report to the police and/or the DBS if we:

- receive an application from a barred person;
 - are provided with false information in, or in support of an applicant's application;
- or
- have serious concerns about an applicant's suitability to work with children.

a. Assessment criteria and process

In the event that you volunteer relevant information (whether in relation to previous convictions or otherwise) during the recruitment process, or we obtain information through a

disclosure check, we will have regard to the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position you have applied for;
- the seriousness of any offence or other matter revealed and in particular if any behaviour included elements of violence and/or sexual misconduct;
- whether your employment could cause a loss of trust in the college or reputational damage to it, including taking in to account any publicly available information about any criminal offence or other matter;
- the length of time since the offence or other matter occurred;
- whether you have a pattern of offending behaviour or other relevant matters;
- whether your circumstances have changed since the offending behaviour or other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) you provide.

We will complete a risk assessment based on the information available to us, including your representations. The risk assessment will be assessed by a senior member of the HR team (normally the HR Director) and in some cases will be verified by the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.

b. Disputing information contained within a disclosure

If you wish to dispute information which has been revealed during a disclosure you may do so by contacting the Disclosure and Barring Service directly.

c. Retention and security of disclosure information

We observe the guidance issued or supported by the DBS regarding the use of disclosure information.