

Thomas Coram Centre and Nursery School

Safer Recruitment and Staff Conduct Policy for Schools in Camden



**Thomas Coram Centre and
Nursery School
49 Mecklenburgh Square
London WC1N 2NY**



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1 Introduction

The nursery school aims to provide a safeguarding culture and environment where pupils feel confident to raise issues and disclose incidents relating to their welfare and safety knowing that staff will respond appropriately to these.

This policy sets out how the nursery school will ensure this through safe recruitment practices that ensure only those suitable to work with children are recruited and by holding expectations of high standards of personal and professional conduct from staff.

2 Safe recruitment: general principles

The nursery school recognises safer recruitment practices are an essential part of creating a safe learning environment and will carry out the processes set out in this policy to ensure those who are not suitable to work with children are identified during recruitment processes and prevented from taking up posts.

When recruiting staff, the nursery school will follow Part 3 of the *Keeping children safe in education guidance (DfE 2025)*. [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/106522/keeping-children-safe-in-education-guidance-2023.pdf)

- The nursery school will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles, governors and those involved in the management of an independent school, in accordance with statutory requirements.
- No staff member, volunteer, governor or anyone involved in the management of an independent school will be allowed to take up posts until all checks and enquiries required for that position have been satisfactorily completed.
- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school (see section 4.3).

- Staff and governors who are involved in recruitment will receive Safer Recruitment training offered through an accredited training provider and no interview should go ahead unless at least one member of the panel has undertaken safer recruitment training.

Governors and staff members who have responsibility for recruitment and who have received the relevant Safer Recruitment training:

Perina Holness – Head teacher. Safer Recruitment Training Autumn 2023
Helen Millward- Governor. Safer Recruitment Training Spring 2024

- Although the head teacher will have day-to-day responsibility for the recruitment of staff, the board of governors will ensure that they maintain an overview of recruitment systems in order to scrutinise practise and ensure all statutory checks are carried out.
- Staff with responsibility for carrying out recruitment checks will ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity.
- In schools, the head teacher will be responsible for keeping a single central record of all staff and volunteers who work at the school and any checks taken out on governors. The records will include details of all checks carried out and the outcome of these checks or any certificates obtained and will be recorded using the template shown at appendix 1.
- Where the school has salaried trainee teachers, the nursery school will ensure that all necessary checks are carried out on the trainees, including DBS checks, and that the outcome of these checks is recorded on the single central record.

- For trainee teachers that are fee-funded, the school will obtain written confirmation from the training provider that the necessary checks have been carried out and that the trainee has been judged to be suitable to work with children.
- Where staff are recruited via third parties such as employment agencies, the head teacher will:
 - seek written confirmation from the agency that the agency has carried out all necessary checks on the individual
 - request written confirmation of the outcome of all checks
 - request written confirmation that an enhanced DBS certificate has been received by the agency
 - request a copy of any DBS certificate where information has been disclosed
 - check the identity of agency staff when they first present for work to ensure they are person against whom the checks were taken out.

3 Advertising and recruitment

When recruiting, the nursery school will ensure that all advertisements for posts are clear that the role is a safeguarding role for which successful candidates should be considered suitable to work with children and that successful applicants will be expected to agree to undergo DBS and other checks as part of safer recruitment practices.

The nursery school will only accept applications using the nursery school application form in order to capture important information about the candidate to enable the nursery school to make informed decisions about their suitability for the role. A CV may be submitted with a completed application form but will not be sufficient for an application.

3.1 Advertisements

The nursery school will ensure the following information is included in any advertisement:

- a statement of the nursery school's commitment to safeguarding and that all applicants will be subject to checks
- information about the role (job description/person specification) and the safeguarding responsibilities that are part of the role
- the skills, experience, knowledge, abilities, attitudes and behaviours required
- the safeguarding requirements of the role, including level of contact with children and whether the post involves regulated activity
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 (where specific spent convictions must be disclosed).

For further guidance on exemptions please see:

<https://www.gov.uk/government/publications/dbs-filtering-guidance>

3.2 Application forms

The nursery school will ensure all candidates for posts are able to access the nursery school's child protection policy online so that they are aware of the nursery school approach to safeguarding and safer recruitment and the expectations on staff in implementing these. The information will include a clear statement that it is an offence to apply for posts involving regulated activity when barred.

Application forms will ask for the following information:

- personal details of the candidate including current and former names, current address and national insurance number;

- details of their present (or last) employment and reason for leaving;
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
- qualifications, the awarding body and date of award;
- details of referees/references (see section 4.2 for further information);
- a statement of the personal qualities and experience that the candidate believes are relevant to their suitability for the post and how they meet the person specification.

3.3 Interview and selection

The nursery school will expect candidates who are shortlisted for interview to complete a self-declaration form as shown in appendix 2. The nursery school will inform shortlisted candidates that it is likely an online search will be conducted as part of due diligence checks.

One of the key purposes of the interview is to establish whether the candidate is suitable to work with children. For this reason, the nursery school will structure interviews to enable a full exploration of the candidate's knowledge, skills and experiences of teaching and/or working with children as well as their attitudes and motivations to safeguarding.

The interview will also explore any unexplained gaps in employment or frequent changes of employment, any information on allegations or disciplinary actions, or any other areas of concern.

4 Checks and vetting for school staff

4.1 Checks to be taken out

The nursery school will take out checks in order to verify the following information for all new staff:

- The applicant's identity must be verified from their passport, birth certificate or other photographic ID and proof of address must be provided. The nursery school will follow government guidance: <https://www.gov.uk/government/publications/identity-proofing-and-verification-of-an-individual>
- The applicant's right to work in the UK must be evidenced through documentation. Only original documentation will be accepted and its validity checked in the presence of the applicant. The nursery school will follow government guidance: <https://www.gov.uk/government/publications/identity-proofing-and-verification-of-an-individual>
- Where the applicant will be involved in regulated activity, an enhanced DBS check will be taken out, including information from the barred list. If the applicant will begin work before an enhanced DBS check can be completed, a barred list check will be obtained.
- In the case of teaching staff, checks will be made on the applicant's academic and vocational qualifications and further checks made on the TRA Teacher Employer Access Service system to ensure they are not prohibited from teaching under a teacher prohibition order.
- Where the applicant has been living abroad, similar enquiries will be made in the country of origin relating to the applicant's qualifications and suitability to teach, including DBS checks. For criminal records checks abroad, the nursery school will follow government advice: <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

Schools can get further information at:

<https://www.gov.uk/guidance/recruit-teachers-from-overseas>

- The nursery school will make checks as to whether the individual has been disqualified from working in these settings. The nursery school will follow the government guidance:

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>

- Enquiries will be made regarding the applicant's state of physical and mental health and the extent that it may affect their capacity to carry out their role.
- The nursery school will keep copies of the following documents on staff personnel files:
 - documents used as proof of identity such as passports or driving licences;
 - a summary of the DBS certificate (but all other documents relating to the DBS check must be destroyed);
 - documents that prove the staff member's right to work in the UK (failure to do so can result in a fine for employing illegal workers).

4.2 References

- Applicants will be asked to provide a full employment history and details of at least 2 referees, including previous and recent employers, and who should be a senior member of staff with the authority to provide references. References from colleagues will not be acceptable.
- All references will normally be taken up prior to interview and will be requested directly from the referee, including references for internal candidates.
- Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source.
- Referees will be contacted to resolve any issues that emerge from the references provided, for example to clarify and verify information provided by the applicant and explore any discrepancies from the information provided on the application form.

- References will be taken up from current employers only; if the applicant is not currently employed, verification of will be sought from their previous nursery school as to the dates the applicant was employed and the reasons for leaving the post.

4.3 DBS checks

In order to ensure that people who work in the nursery school are suitable to do so and are not barred from working with children, the nursery school will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.

The relevant DBS check will be taken out according to the role of the individual and their level of unsupervised contact with pupils.

Enhanced DBS checks including police information and children's barred list information will only be taken out on individuals who are involved in regulated activity. This is defined as:

- teaching, training, instructing, caring for or supervising children (including driving vehicles only for children)
- working in the nursery school on a regular basis giving opportunities for contact with children (for example in an administrative role)
- engaging in intimate or personal care or healthcare within the nursery school.

Full DBS checks with barred list checks will also be carried out on unpaid volunteers who regularly work unsupervised at the nursery school and whose work means they have an opportunity for regular contact with children.

Other staff, contractors and supervised volunteers who have opportunities for regular contact with children but do not carry out a regulated activity will be subject to an enhanced DBS check but **not** barred list checks.

Decisions on whether a person is carrying out a regulated activity or whether their role provides opportunities for regular contact with children requiring a DBS check will be made by whoever is responsible for recruitment in the school, for example the head teacher or governor, based on their role, the level of contact they have with children and whether they are supervised.

The nursery school has robust procedures for day to day staff management and supervision and clear procedures for reporting and acting on concerns. Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.

The nursery school will expect successful candidates to provide a DBS certificate as soon as practicable following appointment so that information on the disclosure can be considered.

The nursery school will consider any disclosures to decide if the candidate is suitable to work with children and will take into account the number and nature of disclosures, their seriousness and when offences occurred. Decisions not to appoint following DBS disclosure will be carefully recorded giving details of how the decision was reached.

The nursery school will follow the DBS code of practice available at:

<https://www.gov.uk/guidance/dbs-check-requests-guidance-for-employers>

The nursery school ensure that all DBS checks carried out on staff are renewed after 3 years of the original DBS disclosure.

4.4 Checks for volunteers

The head teacher will ensure that the following are carried out in relation to unpaid volunteers such as parents who accompany pupils on school outings or provide help in the classroom:

- All volunteers will be required to undergo a recruitment process, with DBS and other checks and interviews taken out as appropriate and proportional to the duties assigned to them.

- The head teacher will carry out a risk assessment to establish whether a volunteer will be carrying out a regulated activity and decide what level of checks are needed in relation to their proposed role.
- Volunteers who are carrying out a regulated activity, for example being left unsupervised with children or providing personal care to children will be subject to an enhanced DBS check, including barred list information.
- New volunteers who are not carrying out regulated activity but who have an opportunity for regular contact with children will be subject to an enhanced DBS check but not a barred list check.
- For other volunteers who are not carrying out regulated activity and do not have regular contact with children, the head teacher/principal will carry out a risk assessment to decide whether standard DBS check should be carried out depending on:
 - the nature of the role
 - what information is already known about the volunteer
 - what references from work or volunteering activity the volunteer has provided regarding suitability
 - whether the role is eligible for an DBS check.
- The nursery school will ensure that all volunteers are competent to carry out the duties assigned to them and are only assigned duties that are suitable to their qualification and experience.
- Volunteers carrying out regulated activity but for whom a DBS check has not been carried out will be suitably supervised by teaching staff at all times at a level that ensures the safety of pupils.
- All volunteers will be fully inducted in relation to all school policies and procedures.

4.5 Checks for governors

The school will take out an enhanced DBS check on governors but a barred list check will only be taken out if the individual governor will be carrying out a regulated activity within the school.

The school will also take out a check with the Teaching Regulation Agency Teacher Services system to establish whether any individual seeking to become the governor of a maintained school or take up a position in the management of an independent school has been disqualified and therefore unable to do so.

5 Staff practice and conduct

5.1 Induction and training

- The head teacher will ensure that all staff are fully inducted so that they are aware of the nursery school commitment to the safety and welfare of pupils and have a full understanding of their safeguarding role.
- As part of their induction, staff will be expected to read and be aware of their role in implementing the following:
 - Part 1 or Annex A of the statutory guidance *Keeping children safe in education (2025)*
 - "What to do if you are worried a child is being abused" guidance (DfE 2015)
 - the safeguarding and child protection policy and procedures
 - the nursery school behaviour policy
 - the staff code of conduct
 - the *Children missing or absent from education* policy.
- Staff will be asked to confirm in writing that they have received and read all relevant staff policies.
- The designated safeguarding lead will ensure that all staff are fully inducted with regard to the nursery school child protection procedures

and that they receive safeguarding and child protection training on a two-yearly basis.

- The head teacher will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- Nursery school staff and governors will receive multi-agency safeguarding training provided by Camden Safeguarding Children Partnership at the relevant level.
- As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role and other relevant multi-agency training courses provided by Camden SCP.
- School staff will also receive training on the use of the Common Assessment Framework assessment and referral process as part of their safeguarding training.
- Nursery school staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation.
- The head teacher and governors will ensure that all teaching staff receive appropriate training on behaviour management in line with the expectations set out in Teaching Standards.

5.2 Conduct and safe teaching practice

- The nursery school expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- The nursery school expects staff to:
 - put the welfare of the pupil first at all times
 - take any complaints or disclosures by pupils seriously and act on them accordingly

- take advice from the designated safeguarding lead when deciding on what action to take
- challenge inappropriate or discriminatory language and behaviour by pupils
- be aware of the increased risk to vulnerable pupils such as those with SEND
- be vigilant to:
 - bullying and abuse between pupils (child on child abuse) and take the view that it may be happening even though it is not reported
 - any bullying or peer abuse taking place online or out of school
 - any risks to pupils from extra-familial harm, criminal or sexual exploitation or serious violence.
- The head teacher/principal will ensure that there is a written code of conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointment that sets out the nursery school expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.
- The code of conduct will include information on how allegations and low-level concerns will be dealt with and nursery school policies around whistleblowing.
- Staff and volunteers should be aware of current guidance on safe teaching practice contained in the *"Guidance for safer working practice for those working with children & young people in education settings"*.
[Professional and Personnel Relationships \(cscp.org.uk\)](https://www.cscps.org.uk/professional-and-personnel-relationships)
- Staff will be expected to follow Camden's online safety policy and social media policies in terms of their online behaviour and use of social media, particularly in relation to professional standards and relationships with pupils. All staff and volunteers will sign an acceptable use agreement before being given access to the nursery school computer system.

5.3 Dealing with concerns and allegations regarding staff

Nursery school staff conduct policies will set out what action is to be taken where concerns arise or an allegation is reported in relation to members of staff, agency staff, volunteers and contractors.

Dealing with low level concerns

A low-level concern involves incidents that do not reach the threshold of harm but which may indicate inappropriate behaviour that is inconsistent with expected standards of staff conduct.

Where staff conduct falls below expected standards giving rise to concerns about appropriate boundaries and professional conduct, these should be reported to the designated safeguarding lead who will liaise with the head teacher/principal or other relevant members of staff to take appropriate action under safeguarding and staff conduct policies in order to help the staff member address issues and improve conduct. It is for the head teacher to decide on what action will be taken in consultation with the designated safeguarding lead or any other relevant member of staff.

Concerns about supply teachers or contractors will also be reported to the designated safeguarding lead who will liaise with their agency so that any patterns of behaviour may be identified and appropriate action taken.

Examples of behaviour and conduct that may be dealt with under these procedures include being over-friendly with pupils, using inappropriate language, contacting pupils via their social media sites or other behaviour that could be misinterpreted and lead to allegations against the staff member.

In the interests of openness and transparency, the nursery school will also encourage staff members to raise incidents where they felt their actions may have fallen below expected standards and may have been misinterpreted or compromising so that they have an opportunity to reflect on their behaviour.

The designated safeguarding lead will keep a record of all low-level concerns about staff members in order to identify patterns of behaviour so that

appropriate action can be taken in a timely manner, for example referral to the LADO.

Records will include the nature of any complaint or concern, the name of the person raising the concern (unless they request anonymity) and the action taken. The records will be confidential and information may be included in any reference.

Where it is unclear whether the threshold of harm has been reached with regard to an incident, the designated safeguarding lead may contact the LADO for advice on a "no names" basis in order to decide if concerns meet the harm threshold and should be referred to the LADO and dealt with under the allegations procedures (see below). Schools/colleges may also refer to the LADO network thresholds document for guidance on what incidents may require a referral to the LADO.

[LADO Threshold Document - national-lado-network.co.uk](http://national-lado-network.co.uk)

Dealing with allegations

An **allegation** involves incidents that may have met the threshold of harm where the person has:

- behaved in a way that has harmed a child, or may have harmed a child and/or:
- possibly committed a criminal offence against or related to a child, and/or:
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or:
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In the event that an allegation is made against a member of staff or volunteer, including a member of staff who is not directly employed by the nursery school such as a supply teacher or contractor, and the allegation involves possible harm to a pupil or raises questions about the suitability of the staff member to work

with children, the nursery school will follow Camden's "Guidance for schools on dealing with allegations against a member of staff". [Introduction \(cscp.org.uk\)](https://www.cscp.org.uk)

The board of governors will appoint the head teacher as the school representative for the purposes of the allegations procedures and this person will link with the Local Authority Designated Officer (LADO) for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

All allegations in relation to staff members will be referred to the head teacher; allegations against the head teacher will be referred to the board of governors.

5.4 Providing intimate or personal care to pupils

Please Intimate Care Policy

5.5 Behaviour management, physical intervention and restraint

The nursery school will put in place a behaviour management policy in line with government guidance and any use of physical intervention and restraint will be linked to the implementation of the school behaviour policy.

At Thomas Coram Centre, we avoid physical intervention and restraint but in the event of an emergency, we comply with Camden policy "*Physical intervention and restraint*"

[Physical-intervention-and-restraint-policy-002.pdf \(cscp.org.uk\)](#)

5.6 Whistleblowing

The nursery school fosters a culture of openness in line with the "Freedom to speak up" review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children or poor practice within the school that may cause a risk to children.

The nursery school recognises that there may be circumstances where staff and pupils feel unable to raise concerns or incidents of malpractice within the nursery school environment as there is reasonable doubt that these would be dealt with adequately.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or schools/colleges are failing to safeguard and promote the welfare of children. Where it is not possible to raise concerns within the nursery school, staff and volunteers may report concerns to the following:

- Camden's lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil;
- Camden's Internal Audit team can be contacted to make a protected disclosure:
 - Nasreen Khan (Nasreen.khan@camden.gov.uk) 020 7974 2211
 - Kam Wong (kam.wong@camden.gov.uk) 020 7974 2281
 - Jeff Cross (jeff.cross@camden.gov.uk) 020 7974 1949
- The following numbers can be used where there are issues regarding the nursery school's overall procedures around safeguarding
 - the Ofsted whistle-blowing line on **0300 123 3155**
 - the NSPCC whistleblowing helpline on **0800 028 0285**.
- The head teacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and pupils.

Appendix 1: School central record- Important notes

This record should indicate what checks have been taken out for the following:

- For schools, all staff, including supply staff and teacher trainees on salaried routes, who work in school and others who work in regular contact children in school, including volunteers and governors

Agency staff

Please give details of confirmation of checks that have been carried out by the supplying agency.

Volunteers

- Unsupervised volunteers should not be left alone or allowed to work in regulated activity.
- For new volunteers in regulated activity who regularly teach children unsupervised an enhanced DBS is needed with a barred list check.
- For new volunteers not in regulated activity, schools should obtain an enhanced DBS certificate.
- Existing volunteers who provide personal care, the school should consider obtaining an enhanced DBS.
- Existing volunteers who are unsupervised do not need to have a DBS check with a barred list check because the volunteer should have been checked originally.
- For existing volunteers not in regulated activity there is no requirement for an enhanced DBS check (a school can request one but may not request a check of the barred list).
- For a volunteer not engaging in regulated activity a risk assessment should be made and a professional judgement made about the need for an enhanced DBS check.
- Supervision of volunteers - there must be supervision by a person in regulated activity, where supervision occurs, this must be regular and day to day and the supervision must be reasonable in all the circumstances to ensure the protection of children.

Regulated activity

Regulated activity - the period condition is at any time on more than three days in any period of 30 days. 'Frequently' is doing something once a week or more. Work of the nature defined is considered regulated activity if done regularly; where this is the case an enhanced DBS check is needed with a barred list check.

Contractors

Contractors or employees of contractors working at the school should have the appropriate level of DBS check if a check is required, eg if the contractor is carrying out teaching or providing a level of care or supervision of children regularly.

Documents and certificates

Please give details of any documentary evidence obtained as part of each check. Please note that there is no requirement to list DBS numbers. Also, to comply with the Data Protection, DBS certificates should not be retained any longer than six months. Other documents to verify identity, right to work in the UK etc, should be kept in personnel file.

