



Safer Recruitment Policy

This policy applies to Steephill School, including the EYFS setting.

Policy Author: Clare Tucker, Bursar

Reviewed and approved by:

Jenny Smith-Spark, Governor responsible for Safeguarding: 20.6.23

Full Governing body: **20.6.23**

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Steephill School is committed to safeguarding and promoting the welfare of children and expects all colleagues and volunteers to share this commitment. This policy supports the School's Safeguarding Policy.

This policy applies to all appointments, including teaching and non-teaching employees, supply teachers, volunteers, contractors, third parties and governors within Steephill School.

AIMS AND OBJECTIVES

The aim of the Safer Recruitment Policy is to identify, deter and reject people who might abuse children or are otherwise unsuited to working with children by having appropriate procedures for appointing staff. The School has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the School based on the applicant's abilities, qualifications, experience and merit as measured against the Job Description and Person Specification.

The recruitment and selection of employees will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation. All safer recruitment checks will be done in accordance with data protection and employment legislation requirements. If a colleague involved in the recruitment process has a close personal or familial relationship with an applicant, or any other actual or perceived conflict of interest, they must declare this as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process. Throughout their employment at the School, all employees are expected to disclose any convictions, cautions, court orders reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the School).

ROLES AND RESPONSIBILITIES

It is the responsibility of the Governing Body to:

- Ensure the School has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements.
- Monitor the School's compliance with these policies and procedures.

It is the responsibility of the Head, Chair of Governors and other person involved in recruitment to:

- Ensure that the School operates Safer Recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the School.
- Monitor contractors' and agencies' compliance with this document and ensure details of all contractors and third parties are registered with the School Office.

- Promote the welfare of children and young people at every stage of the recruitment process. The governing body has delegated responsibility to the Head to lead in all appointments. School governors may be involved in staff appointments, but the final decision will rest with the Head. The position of Head will be appointed by a panel of the Governing Body.

RECRUITMENT AND SELECTION OF STAFF

Advertising

Any advertisement will make clear the School's commitment to safeguarding and promoting the welfare of children. All documentation relating to applicants will be treated confidentially in accordance with Data Protection laws.

Application Forms

Steephill School uses its own application form. All applicants for employment will be required to complete an application form containing questions about their academic and employment history and their suitability for the role. The application must be completed in full. CVs may be supplied but will not be accepted as a substitute for an application form. All applicants are required to fully account for any gaps or discrepancies in employment history and any discrepancies will be explored at interview and may be explored with referees. All applicants must provide accurate answers within their application. Applicants should be aware that providing false information is an offence and could result in the application being rejected or disciplinary action being taken if the applicant has been selected. Where possible, shortlisted candidates will be required to physically sign a hard copy of their application at the point of interview to confirm that the information given is accurate. Applicants who may pose a risk to children may be referred to the police and other professional regulatory bodies (e.g. Teaching Regulation Agency; Disclosure and Barring Service). Information regarding the disclosure of a criminal record must be made in confidence by providing a supplementary sheet within a sealed envelope for the attention of the Head.

Applicants with a disability are invited to inform the School so that reasonable adjustments and arrangements can be made to assist them with the application and interview process.

Job Descriptions and Person Specifications

A Job Description and Person Specification will be produced prior to taking any other steps in the recruitment process. The Job Description will clearly and accurately set out the duties and responsibilities of the job role including a commitment to safeguarding and promoting the welfare of children. The Person Specification will detail the skills, experience, abilities and expertise that are required to do the job.

References

References for short listed applicants will be requested in advance of an interview. Where an applicant has indicated on their application form that they do not wish their current

employer to be contacted prior to interview, this reference will be taken up immediately after interview and prior to any formal offer of employment being made.

Two written references must be provided. A reference from the applicant's current or most recent employer must be provided. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. Any discrepancies, anomalies or information which raises a concern will be followed up. All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism". In doing so the school will always have regard to the Prevent Duty guidance and the definition of "extremism" set out in KCSIE. If the applicant is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the applicant has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure.

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

Interviews

There will be a face-to-face interview either in person or via another method e.g., Zoom. The same panel will see all the applicants for the vacant position. The interview process will always explore the applicant's motivation and suitability to work with children. The interview will assess the applicant's ability to carry out the Job Description and meet the Person Specification. All gaps in employment or academic history and any concerns raised from references will be explored at interview. In all cases the interview panel will seek to satisfy themselves of an applicant's suitability to work with children in a school environment. Any information in regard to past disciplinary action or allegations, cautions or convictions must be disclosed and will be discussed and considered in the circumstance of the individual case during the interview process. At least one member of any interviewing panel will have undertaken Safer Recruitment training. Interview panels will always consist of at least two people. The member of the panel who holds Safer Recruitment training is responsible for ensuring suitable questions are asked.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to, children. Therefore, any convictions and cautions that would

normally be considered 'SPENT' must be declared when applying for any position at Steephill School. As a result of amendments to the Rehabilitation of Offenders Act 1974 (exceptions order 1975) in 2013 and 2020, some minor offences are now protected (filtered) and should not be disclosed.

OFFER OF APPOINTMENT

The appointment of all new employees is subject to the satisfactory receipt of all appropriate recruitment checks including:

- Verification of identity
- Verification of the right to work in the UK
- At least two satisfactory written references
- A full employment history together with a satisfactory explanation of any gaps in employment
- Verification of professional qualifications, where appropriate
- A satisfactory enhanced DBS check and if appropriate, a check of the Barred List maintained by the DBS
- Where the successful applicant has worked or been resident overseas such checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered
- For an applicant that has taught in the EEA a letter of professional standing from the regulating authority is required
- For an applicant to be employed as a teacher, a check that that the applicant is not subject to a prohibition order issued by the Secretary of State. Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:
 - Planning and preparing lessons and courses for pupils
 - Delivering and preparing lessons to pupils
 - Assessing the development, progress and attainment of pupils
 - Reporting on the development, progress and attainment of pupils
- Satisfactory medical fitness questionnaire
- Receipt of a signed Staff Suitability Declaration form showing that the applicant is not disqualified from providing childcare under the Disqualification under the Childcare Act 2006 (June 2016).
- Where the successful applicant will be taking part in the management of the School, a check under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Management Team (including non-teaching staff). With effect from May 2018 this check also applies to staff internally promoted to management positions.

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment practice. The checklist will be retained on personal files. The office will confirm when all paperwork has been received and only then can a start date be agreed with the applicant.

Proof of Identity and Right to Work in the UK

All applicants invited to attend an interview at the School will be required to bring at least three identification documents as proof of address, identity and eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations. Only original documents or certified copies are acceptable.

Where relevant applicants must provide evidence for a change of name. Applicants must provide any additional documents required to verify their right to work and reside in the UK.

Qualifications

All applicants must provide proof that they have obtained any qualification specified for the role or relevant to the position. Only original or certified copies of certificates are acceptable.

Employment History

All applicants will be required to provide a full employment history as part of the application process. Applicants will be required to provide a satisfactory explanation for any gaps in employment.

DBS (Disclosure and Barring Service) Certificate

All employees at Steephill School require an enhanced DBS Certificate and therefore a DBS Certificate must be obtained before the commencement of employment of any new employee. All staff in regulated activity will require a barred list check.

Where employees have a DBS Certificate and have previously signed up to the Update Service, consent must be given for the validity of that certificate to be checked.

In exceptional cases and only when permission is granted by the Head will a new employee be able to start without a DBS certificate. In such cases the DBS certificate must have been requested and a separate barred list check (where required) undertaken in advance of appointment. In such cases:

- Confirmation of appointment will be subject to receipt of a satisfactory DBS Certificate
- The DBS application will be made in advance of the start date
- A satisfactory check of the barred list, all overseas checks and all relevant prohibition checks will be completed in advance of the start date
- Appropriate safeguards, such as supervision will be put in place, and recorded in a formal risk assessment
- Safeguards will be reviewed every two weeks and must be approved by the Head.
- The applicant concerned will be informed of the measures in place

Portability of DBS Certificates

The DBS code of Practice does not facilitate portability of DBS Certificate checks unless the applicant has registered to the DBS Update Service. For clarity portability refers to the re-use of a DBS Certificate obtained for a position in one organisation and later used for another position in another organisation. Steephill School is committed to adhering to these Codes of Practice and does not accept DBS Certificates carried out by another organisation unless they are registered with the DBS Update Service.

Validity of DBS Certificate

All staff are obliged to inform the School should they receive any convictions, cautions, court orders, reprimands or warnings after the date of their DBS certificate received by the School. Failure to declare any convictions may disqualify an applicant for appointment or result in summary dismissal if the discrepancy comes to light subsequently.

Dealing with convictions

The School operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- changes in circumstances;
- decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Head. A decision will be made by the Head following this meeting.

Barred List

Before starting work all new staff in regulated activity will be checked against the barred list, a list maintained by the Disclosure and Barring Service of individuals who are barred from working with children.

It is illegal for schools to employ anyone who is on the list.

The definition of regulated activity includes:

- All regular work for schools with opportunity for contact with children except:
 - Work (not entailing personal care) by supervised volunteers
 - Work (not entailing care or teaching) by occasional/temporary contractors
 - Work by pupils for other pupils (excepting for those in early years)
- Personal care, or health care:

- Personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing
 - Health care means care for children provided by or under the direction or supervision of, a regulated health care professional
 - Within the definition of care, activity is always regulated; considerations of regularity and supervision do not apply
- Regular, unsupervised teaching, training, instructing, caring for or supervising children
 - Regularly providing advice or guidance for children on well-being
 - Driving a vehicle only for children.

Overseas Teaching Sanctions

The School up until 31 December 2020 was required to check whether individuals who had taught in countries in the EEA and who were carrying out teaching work (including peripatetic and coaching), were subject to a sanction or restriction imposed by another EEA professional regulating authority for teachers. The check was carried out using the TRA. With effect from 1 January 2021 the TRA will no longer maintain a list of those teachers who have been sanctioned in EEA member states. From 1 January 2021 the School will seek to obtain a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Information regarding this is available at the National Recognition Information Centre (NARIC).

Additional Overseas Checks

All new employees who have lived or worked outside the UK for a continuous period of 3 months or more at any time in the last 10 years will be subject to additional checks. The School may also make additional overseas checks on any other applicant where these checks are deemed relevant by the School.

These checks are required to supplement the information provided by the Disclosure and Barring Service and suitable checks must be completed before the applicant begins work.

The Home Office provides guidance on the appropriate checks for each country and the School will have regard to this guidance. Where the country is specified as unable to produce an official record, the School will make all reasonable efforts to verify an applicant's suitability. This will include seeking additional references which cover the time spent overseas. All applicants must co-operate fully in the process to obtain these additional checks.

In exceptional cases, where the official record has been requested but not received before the applicant is due to start work, the applicant may start work only if:

- Additional satisfactory references covering the time overseas have been received in advance of the applicant starting work and

- The Head has given permission for the applicant to start work, subject to the same safeguards set out above for when a DBS Certificate has not been received.

Further details on the overseas checks available can be obtained here:

<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

Prohibition from Teaching

The TRA maintains a database for all teachers eligible to teach in the maintained sector in England (those who have QTS). The database is referred to as the “Secure Access Portal”.

All applicants who will be carrying out teaching work will be checked on the DfE Secure Prohibition list for the following:

- Those that have been prohibited from teaching
- Those that have failed to successfully complete their induction or probation period
- Those that may be the subject of a suspension or conditional order imposed by the General Teaching Council for England (prior to abolition) that is still current

A prohibition order aims to protect pupils and to maintain public confidence in the profession. Teaching work is defined in The Teachers’ Disciplinary (England) Regulations 2012 to encompass:

- Planning and preparing lessons and courses for pupils
- Delivering and preparing lessons to pupils
- Assessing the development, progress and attainment of pupils
- Reporting on the development, progress and attainment of pupils

Prohibition from Management

All governors, headteachers, staff on the senior management team and positions with management responsibility will be subject to a check for prohibition from management (section 128 direction).

With effect from May 2018 this check also applies to staff internally promoted to management positions.

Disqualification from Childcare

The DfE Keeping Children Safe in Education, requires schools to ensure that all staff working or directly concerned in the management of any Early Years setting, including Reception and out-of-hours school care for children up to eight years of age are not “disqualified”.

Steephill School requires all staff to sign a Disqualification from Childcare declaration.

The grounds for disqualification include:

- They have been cautioned for, convicted or charged with certain violent and sexual criminal offences against children and adults, at home or abroad;

- Other orders have been made against them relating to their care of children;
- They have had their registration cancelled in relation to childcare or children's homes or have been disqualified from private fostering.

If a staff member has grounds for disqualification and is disqualified, they may, in some circumstances, apply to Ofsted for a decision to waive the disqualification. For more information on disqualification please visit the following website:

<http://www.ofsted.gov.uk/resources/applying-waive-disqualification-early-years-and-childcare-providers>

Medical Fitness

There are certain questions Steephill School may ask at an interview stage to determine whether applicants can undertake a function which is intrinsic to the job.

Anyone appointed to a post involving regular contact with children must possess the appropriate level of physical and mental fitness before any appointment offer is confirmed.

All successful applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required.

Staff must also inform the School of any changes to their mental or physical health that may impact upon their ability to work with children or any changes to their own circumstances that the School should be aware of.

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

Prevent Duty

The School has a legal duty under the Counterterrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent duty. Schools are required to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.

VOLUNTEERS

Volunteers may require an enhanced DBS check because of the frequency of their volunteering activity and the contact they have with children.

Volunteers and parents who only accompany employees and children on one off outings or trips that do not involve overnight stays, or who only help at specific one off events e.g. sports day, school open day etc. are not required to have an enhanced DBS check.

Volunteers will always require an enhanced DBS check if they are involved in supervising children overnight.

If a volunteer is not expected to engage in regulated activity, then the School will determine whether an enhanced DBS check should be obtained by giving consideration to the following:

- The volunteer's role including the duration, frequency and nature of contact with children, and then:
- What the School knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- Whether the volunteer is well known to others in the School Community who are likely to be aware of behaviour that could give cause for concern;
- Whether the volunteer has other employment, or undertakes voluntary activities where referees who advise on suitability; and
- Any other relevant information about the volunteer or the work they are likely to do.

Under no circumstances will a volunteer for whom an enhanced DBS check has not been obtained be left unsupervised with children. Any risk assessment decision regarding the checks made for volunteers must be appropriately recorded.

SUPPLY AGENCY STAFF

When the School uses agency or supply staff (in any position), the School must obtain confirmation in writing from the agency that all relevant checks have been completed in respect of that person. This must be received in advance of that person commencing work.

Supply agencies are required to perform the following checks on each person supplied:

- Verification of identity
- An enhanced DBS check which has been made no earlier than 3 months before the person is due to start work at the School
- Verification of right to work in the UK
- Where required, a check of the Barred List maintained by the DBS
- For a person supplied as a teacher, a check that the applicant is not subject to a prohibition order issued by the Secretary of State.
- Where the person supplied will be taking part in the management of the school, a check under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014.
- Verification of relevant qualifications
- Where the person supplied has worked or been resident overseas such checks and confirmations as the School and agency may consider appropriate so that any relevant events that occurred outside the UK can be considered
- Where the person supplied has taught overseas, a letter of professional standing is required
- Receipt of at least two satisfactory references
- A declaration or verification of medical fitness
- Check of previous employment history
- Check for disqualification from providing childcare under the Disqualification under the Childcare Act 2006 (June 2016).

Agencies are required to inform the School of any information which has been disclosed on the DBS certificate obtained by the agency. The School will require supply staff to show their original DBS certificate to the School.

All supply staff are required to provide proof of identity on the first day of arrival.

CONTRACTORS

Under no circumstances will unchecked contractors be allowed to work unsupervised within the School. Supervision of contractors must be undertaken by a person who themselves is in regulated activity.

Where contractors are to be checked, the levels of check undertaken will be appropriate to the role and whether the work is classed as regulated activity.

All checked contractors must be notified to the School Office who will ensure the correct checks have been completed by the employer before the contractor is allowed to work unsupervised.

GOVERNORS

All Governors complete a selection process, which requires the submission of a CV and an interview with selected Governors from the Nominations and Remuneration Committee.

Every Governor has an enhanced DBS check, barred list check and prohibition from management check. Each appointment is ratified by the Full Governing Body for a period of six years and may be subject to re-appointment.

SINGLE CENTRAL RECORD OF APPOINTMENTS (SCR)

The School maintains a single central record of all recruitment and vetting checks. This record is maintained by the Bursar in accordance with the requirements of the Independent School Standards Regulations 2014.

The Record will contain details of all current members of staff at the School, the Governors and all individuals who are in regular contact with children including supply staff, volunteers and those employed as third parties.

LEAVING EMPLOYMENT AT STEEPHILL SCHOOL

Despite the best efforts to recruit safely there will be occasions when allegations of abuse against children and young people are raised. In cases relating to the behaviour of an employee the School's Code of Conduct and Disciplinary Procedure will apply.

There is a legal requirement for Steephill School to make a referral to the DBS where the School believes that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

In cases of dismissal or resignation due to a person's behaviour towards children, Steephill School will consider a referral to DBS, TRA and the Children's Safeguarding Unit of the circumstances because the employee is leaving Steephill's employment.

DOCUMENT RETENTION AND DATA PROTECTION

The School is legally required to undertake the above pre-employment checks and to take all reasonable steps to establish an applicant's suitability to work with children. Therefore, if an applicant is successful in their application, the School will retain on their personal file any relevant information provided as part of the application process.

This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications and any other documentation relevant to the application.

Medical information may be used to help the School to discharge its obligations as an employer e.g. so that the School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue. Medical information is also used to establish whether an applicant is medically fit to undertake their duties in regard to caring for children.

This documentation will be retained by the School in line with statutory and legal requirements. All information retained on employees is kept centrally in the School Office.

The School will retain documents relating to the vetting of other adults (e.g. volunteers, 3rd party providers, contractors) on the same basis.

Steephill School will retain all interview paperwork on unsuccessful applicants for a period of 1 year, after which time the notes will be confidentially destroyed.

MONITORING AND EVALUATION

The Head will be responsible for ensuring that this policy is monitored and evaluated throughout the School.

This will be undertaken through regular audits of the Single Central Register, appropriate training for those involved in recruitment and ensuring that the policy is reviewed and updated in line with relevant legislation. During the recruitment process all recruitment checks are quality assured by a second member of the School Office.

The Safeguarding Governor will periodically check the Single Central Register and records of appointments to ensure compliance.

APPENDIX A –SINGLE CENTRAL RECORD

Steephill School is required by both The Education (Independent School Standards) Regulations and Keeping Children Safe in Education (KCSIE) to maintain a Single Central Record of pre-appointment checks (SCR).

This appendix sets out what information the SCR must contain, who must be included on it and how it must be completed to ensure compliance with regulatory requirements.

PEOPLE WHO MUST BE INCLUDED IN THE SCR

The following people must be included in the SCR:

- All staff who work at the School
- All supply staff who work at the School
- All members of the Governing Body
- All self-employed contractors arranged by the School who are in regulated activity

KCSIE no longer requires that checked volunteers are included in the SCR.

INFORMATION WHICH MUST BE RECORDED IN THE SCR

The SCR is maintained as a table of records in electronic format. Each entry contains:

- Person number
- Name
- Post
- Start date (the date the applicant started work in school)
- Additional checks as detailed below

The following checks are required to be recorded on the SCR:

CHECK	WHICH DATE IS RECORDED?
Identity	Date original documents were verified
Barred List	Date check was made
Professional Qualifications	Date original documents were verified
Enhanced DBS Disclosure/DBS Update Check	Date original certificate was verified & disclosure number
Right to work in the UK	Date original documents were verified
Prohibition from teaching	Date check was made
Prohibition from management	Date check was made
Additional overseas checks	Date original documents were verified
O/S Teaching Sanction checks	Date check was made
References	Date original documents were verified
Employment history	Date check was made
Medical fitness	Date original document was verified
Disqualification from childcare	Date original document was verified

The initials of the person who carried out each check are recorded in the cover sheet within the personal file, together with a signature of the additional staff member who performed the quality assurance to confirm all checks had been made correctly.

The 'notes' column in the SCR allows for additional explanation or clarification to be added where necessary.

Where the person is a member of supply staff (supplied by an agency to work under the direction of the School), the date recorded in the SCR will be:

- The date the person's identity was verified by the School
- The date the person's original DBS certificate was verified by the School
- The date that written notification was received from the agency in respect of all other applicable checks

CHECKS MADE ON THE CHAIR OF THE GOVERNING BODY

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

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

ADDING AND REMOVING ENTRIES IN THE SCR

An entry must be made in the SCR against each check before any person may start work. All columns must contain the appropriate date or information. Where a check is not required this must be clearly indicated by 'N/A'.

In the exceptional case that a person starts work before the original DBS certificate and/or an official overseas record has been received, a risk assessment will be made (in line with the School's Safer Recruitment Policy) and the date of the first risk assessment recorded in the SCR. An additional note will be added detailing the circumstances.

A record will be maintained in the SCR while the person continues to work or volunteer at the School. When a person no longer works or volunteers at the School, their record will be transferred to a record of past staff, where it may be retained indefinitely.