GREENE'S COLLEGE OXFORD

Safer Recruitment Policy

This policy was adopted in August 2026.

This policy is due to be reviewed in August 2027.

The person responsible for the implementation of this policy is the College Principal.

It is the responsibility of the College's Governing Body to ensure that this policy is reviewed and updated annually.

Introduction

Greene's College (Greene's) recognises its responsibility for safeguarding and child protection and that prevention of abuse is of paramount importance. The safe recruitment of staff at Greene's is the most

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significant element in seeking to prevent such abuse and for this reason Greene's is committed to a thorough and consistent Safer Recruitment Policy.

This policy follows guidance outlined in the Department for Education "Keeping Children Safe in Education" (September 2026) and has been developed to embed safer recruitment practices and procedures throughout Greene's and to support and reinforce a keeping children safe culture.

It is an essential element in creating and maintaining a safe and supportive environment for all students, staff and others within the college community and aims to ensure both safe and fair recruitment and selection of staff:

- attracting the best possible candidates
- deterring prospective candidates who are unsuitable
- identifying and rejecting candidates who are unsuitable to work with children

This policy reinforces the expected conduct outlined in the Code of Conduct for Staff with which staff are expected to be familiar with.

Greene's is committed to using procedures that deal effectively with people who fail to comply with its safeguarding and child protection policies and procedures.

Greene's recognises that it is duty bound to refer any substantiated allegation of abuse against a member of staff to the Local Authority Designated Officer (LADO) within one working day of the allegation being made.

A referral will be made if a member of staff has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children

Greene's also recognises that it is duty bound to refer to the Disclosure and Barring Service (DBS), details of any member of staff who, following disciplinary investigation, is dismissed or resigns because of misconduct towards a child and that we may refer any concerns we have before the completion of this process.

Greene's recognises that safer recruitment and selection is not just about the start of working at Greene's, but is part of a larger policy framework for all staff.

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1. In this Policy, a child is defined as anyone who has not yet reached their 18th birthday. “Children” therefore means “children and young people” throughout.
2. Staff includes all adult staff on or off site working with any children who are enrolled as students at Greene’s; and includes permanent and temporary employees as well as regular ancillary staff and volunteers; and – in this document – includes all tutors.

Principles
The aim of the Safer Recruitment Policy is to help deter, reject or identify people who might abuse children or are otherwise unsuited to working with children by having appropriate procedures for appointing staff.

Greene’s has a principle of open competition in its approach to recruitment of staff and seeks to recruit the best and most suitable applicants based on their abilities, qualification, experience and merit as measured against the job description and required skills.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation.

If a current member of staff involved in the recruitment process has a close personal or familial relationship with an applicant they must declare it as soon as they are aware of the individual’s application and avoid any involvement in the recruitment process.

Roles and responsibilities
Overall responsibility for the maintenance and promulgation of this policy is with the Managing Director. This includes ensuring that appropriate staff have completed safer recruitment training.

The Managing Director also ensures that effective policies and procedures are followed for the recruitment of all staff in accordance with statutory requirements and other government guidance regarding employment and Oxfordshire Safeguarding Children Partnership (OSCP) guidance on safer recruitment.

With regard to the recruitment of tutors, this responsibility lies with the Academic Director.

Advertising
From time-to-time, Greene’s may advertise for a range of staff jobs. Any advertisement and/or initial communication will make clear the school’s commitment to safeguarding and child protection.

Application

Greene's uses either its own application form for administrative and management staff positions or its online registration process for academic staff including tutors. In either
case, applicants will be required to complete an application containing questions about their academic and full employment history and suitability for the role.

In particular, applicants are required to account for any gaps or discrepancies in employment history. The application process will also include the applicant's declaration regarding convictions and working with children.

All applicants will be made aware that providing false information is not acceptable and could result in the application being rejected or summary dismissal if the applicant has been selected, and possible referral to the police and other professional regulatory bodies.

Prospective applicants must either complete and return a signed application form or – for online registrations – provide a declaration that the information provided is complete, accurate and true. Where there is an application deadline, incomplete application forms will be returned to the applicant prior to the deadline date.

A curriculum vitae will only be accepted alongside a full application form.

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act.

Job descriptions
The job description is a key document in the recruitment process, and must be finalised prior to taking any other steps. It will clearly and accurately set out the duties and responsibilities of the job and includes the personal skills, experience, abilities and expertise required for the job (person specification).

The person specification is of equal importance to other elements of the job description and informs the selection decision – it will also include a specific reference to suitability to work with children.

References
References will be sent for either immediately after short-listing – regarding administrative and management staff jobs – or prior to a final interview – regarding the appointment of academic staff or the engagement of tutors – in order to discuss and probe any finding that may arise with applicants prior to any formal job or tuition offer being made. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted. In such

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

Two professional/character references must be provided - one of which should be from the applicant's current/most recent employer. These 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 or anomalies will be followed up with the applicant. Direct contact by phone or face-to-face may be undertaken with each referee to verify the reference. In the case of references for tutors, the College will not offer any form of work to the tutor before at least one reference has been received and approved by the College and, in these cases, work will only be allocated to tutors who have satisfied all other areas of the safeguarding and child protection checks run by the College. Tutors for whom the College has received only one reference may only be offered work with the express permission, and at the direction of, the Academic Director.

Referees will be asked specific questions – see Appendix I – about the following:

- The candidate's suitability to work with children
- Any substantiated allegations
- Any disciplinary warnings, including time-expired warnings, relating to the safeguarding of children
- The candidate's suitability for the post

From a previous or current employer, reference requests will include the following:

- Job title and salary
- Sickness record
- Attendance record
- Disciplinary record

All appointments are subject to satisfactory references, vetting procedures, risk assessment and DBS or other national clearance.

Greene's does not accept open references, testimonials or references from relatives.

Identification of the Recruitment Panel

There will always be at least two people on the final interview panel, one of whom will have successfully completed training in safer recruitment. Broad agreement should be reached prior to the interview as to how answers from the candidate will be assessed.

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Original documents

only will be accepted and electronically scanned copies will be taken. Electronic copies of documents from unsuccessful applicants will be destroyed within six months of receipt unless permission has been sought and given otherwise.

Interview
For administrative and management and full-time academic posts face-to-face interviews will be arranged. Engaged tutors may be interviewed either face-to-face or online.

There will be a face-to-face interview wherever possible, and the same interviewers will see all the applicants for the position in question.

Candidates called to interview will receive:
- Written communication confirming the interview and any other selection techniques
- Details of the interview day including any tasks – such as observation or exercises – to be undertaken as part of the interview process
- The opportunity to discuss the process prior to the interview
- Be asked to provide proof of identity

Candidates will be required to:
- Explain any gaps in employment
- Explain satisfactorily any anomalies or discrepancies in the information available to the panel
- Declare any information that is likely to appear on the DBS or equivalent national disclosure
- Declare any past disciplinary action or allegations, cautions
- Demonstrate their ability to safeguard and protect the welfare of children and young people.

The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the interviewers to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria. In particular, any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process.

Employment Checks
An offer of appointment will be conditional and all successful candidates will be required to:
- Provide proof of identity
- Complete an enhanced DBS application and receive satisfactory clearance

- Provide an overseas police check where they have lived or worked outside the United Kingdom, but see Appendix II
- Provide proof of professional status
- Provide actual certificates of qualifications
- Provide proof of eligibility to live and work in the UK

Prohibition from management (Section 128) checks: these will be carried out on all prospective appointments for management positions. More detail on the types of appointments for which this check must be carried out is as follows:

All prospective appointments for management positions, and any new appointments to the school's proprietor body, will be checked to ensure that the person concerned has not been barred by the Secretary of State (under s.128 of the Education and Skills Act 2008) from taking part in the management of an independent school. This will be done through the DBS barred list checking process, except when the prospective appointment is not in regulated activity, in which case the NCTL prohibitions list will be used instead. According to DfE guidance, the scope of these barring directions covers membership of proprietor bodies, including governors if the governing body is the proprietor body of the school, the headteacher, any teaching positions on the senior leadership team, and any teaching positions that carry departmental headship. Other teaching posts with additional responsibilities do not count as 'taking part in management'. For non-teaching staff, only posts which are part of the senior leadership team should be regarded as 'management' for the purposes of checking for the existence of a barring direction. All employed school staff are regarded as being 'in regulated activity' for the purposes of these checks.

EEA checks: in the case of candidates from the European Economic Area (EEA) who will be carrying out tutoring, we will also carry out a check to establish whether they are subject to a sanction or restriction imposed by another EEA professional regulating authority for teachers.

All checks will be:
- Confirmed in writing
- Recorded and retained on the college's Single Central Record
- Followed up if they are unsatisfactory or if there are any discrepancies in the information received.

The appointment will only commence subject to all checks and procedures being satisfactorily completed. Appendix II provides further clarification on UK DBS and overseas police checks. / A personal file checklist will be

used to track and audit paperwork so obtained (Appendix III). The checklist will be retained on personal files.

Induction
All staff new to Greene's will be made aware of the systems which support safeguarding, these are explained to them as part of their induction and include:

- The child protection and safeguarding policy
- The staff code of conduct which will govern how staff carry out their roles and responsibilities.
- The role of the designated lead
- Keeping children safe in education part 1
- Whistleblowing policy
- Managing allegations about staff or volunteers
- What to do if they have a concern about a child

Single centralised register of staff details
A single centralised record of recruitment and vetting checks – see Appendix III checklist for staff recruitment – for all staff is kept on Greene's Online. This register is kept up-to-date by the Bursar for administrative and management and full-time academic staff; and by the Head of Tutor Operations.

The Managing Director is responsible for auditing the register and reporting their findings to the senior management team during the Governing Body meetings.

Record retention and data protection
Greene's will retain digital copies and paper notes from the interview process on all applicants for a period of six months, after which time they will be deleted or otherwise destroyed. The six month retention period is in accordance with the Data Protection Act 2018 and will also allow Greene's to deal with any data access requests, recruitment complaints or to respond to any complaints made to an employment tribunal.

Appendix I: Questionnaire for referees

Applicants short-listed for interview are asked to provide details of two referees who are contacted by e-mail and asked to complete a reference.

The questions that are asked and which relate to the Greene's Safer Recruitment Policy are:

1. How long have you known the applicant? (please include dates)
2. In what capacity have you known the applicant?
3. Is the applicant, or has the applicant been, employed by you? If 'Yes':
   - what were his or her dates of employment, position and duties.
   - were his or her duties performed to your satisfaction? (If not, please state why not)
   - would you re-employ the applicant? (if not, please state why not)
   - has the applicant been subject to any disciplinary procedures? (If yes, please provide details)
4. Whether or not the applicant has worked for you, do you believe that he or she is suitable for working with children and young people in an educational environment?
5. Are you completely satisfied that the applicant is suitable to work with children and young people? (If not, please state why not).
6. To your knowledge has the applicant been subject to disciplinary procedures where the sanction is still current? (If yes, please give details).
7. To your knowledge has the applicant been subject to any disciplinary procedures relating to the safety and welfare of young people including anywhere the disciplinary sanction has expired or where the allegation was unfounded and whether or not disciplinary sanctions were imposed? (If yes, please give details).
8. To your knowledge have there been any allegations or concerns expressed about the applicant that relate to the safety and welfare of young people? (If yes, please give details).

References are followed up by telephone or e-mail if necessary.

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Appendix II: DBS Certificate checks and overseas police checks

DBS Certificate checks

Staff at Greene's require an enhanced DBS Certificate check which must be obtained before the commencement of employment of any new employee.

New staff can provide an enhanced DBS Certificate check from the last three years if they can show continuous service – i.e. with gaps in employment of less than three months – with one or more educational institutions in the UK. Under such circumstances, Greene's
– at its entire discretion – may still require a new enhanced DBS Certificate check to be made. In the case of an engaged tutor this will be at their cost.

Any staff that takes formal leave for more than three months (i.e.: maternity leave, career break etc.) must be re-checked before they can return back to work. Staff at Greene's are obliged to inform the Managing Director of any cautions or convictions that arise between these checks taking place.

Greene's will meet the cost of the initial and any subsequent DBS certificate checks for administrative and management and full-time academic staff. Engaged tutors will meet their own costs for all initial and subsequent DBS certificate checks.

Tutors may wish to join the DBS update service if they are likely to require another check in the future. For the currently prevailing fee, payable by the tutor, tutors may sign up to the Service if their check was issued after 17 June 2013.

DBS Certificate checks at Greene's are arranged by the Bursar and an appointment should be made where one is required.

The DBS no longer issue Disclosure Certificates to employers, therefore staff should bring their Certificate to the Bursary at 45 Pembroke Street, Oxford OX1 1SZ on receipt and before they can commence work.

Dealing with convictions

If a DBS Certificate is returned with details of convictions the Bursar will notify the Managing Director or the Academic Director as appropriate and – in discussion with senior management as appropriate – 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
- de-criminalisation and remorse

The results of these discussions will be recorded and a formal meeting may take place face- to-face with the staff concerned to establish the facts. A decision will be made following these deliberations.

Overseas police checks
Staff from outside the UK or who have lived or travelled outside the UK for more than three months are subject to additional checks – usually a police check from the relevant country or countries. Greene's recognizes that this can be a complex, time consuming and costly process depending on the circumstances. It also may not always be practicable for all jurisdictions and within the time constraints of tutor recruitment. This may be a problem of particular relevance for tutors wishing to be engaged by Greene's within a short period of time but who are not from the UK or who have worked extensively outside the UK.

Under such circumstances the following applies:

Applicant staff should complete sign and return the Greene's self-declaration safeguarding and child protection form – copies of which can be obtained from the Bursar.

Greene's will also undertake a risk analysis that takes into account the fact that overseas nationals present in the UK with a Tier 4 or Tier 2 visa will have already completed a criminal records declaration to UK Visas & Immigration; that many of our applicant tutors are studying and working at the University of Oxford which requires additional criminal record information where relevant and available (see: http://www.ox.ac.uk/admissions/graduate/applying-to-oxford/university-policies/criminal-convictions); and takes into account known information regarding the behavior and nature of potential offenders.

There are seven points to the risk analysis:
1. Applicant gender
2. Valid visa
3. If, yes, reputation of UKVI sponsoring institution
4. Has applicant worked with children previously and to what extent
5. If, yes, can this experience be verified
6. References have been taken-up
7. Referees have been spoken to

After consideration of the information collected as a result of this risk analysis, Greene's – at its sole discretion – may allow tuition to take place but under prescribed conditions which will vary from case-to-case – such as at supervised premises at Greene's or official university of Oxford buildings such as a department. Whatever, the decision and arrangements they will be made jointly by the Managing Director and the Academic Director and documented on the centralized register of staff details and reported to senior management for approval and record.

Within a reasonable period of time - the applicant should also provide original documentation from the police authority – or other relevant authority – from the country or countries concerned detailing the status of their criminal record. In many countries this document is called 'A certificate of no criminal conviction', 'A certificate of good conduct' or 'A police clearance certificate'. Guidance on how this can be done for many countries is provided by the UK government at:

www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants

Appendix III: Checklist for staff recruitment

Greene's personal file checklist to support safe recruitment

Item:	Date received and uploaded:	Approved by:
Completed application form		
Job description – including person specification		
Reference 1 returned		
Reference 2 returned		
Reference 1 comment on suitability		
Reference 2 comment on suitability		
Reference 1 questions on child protection answered		
Reference 2 questions on child protection answered		
Reference 1 followed up by telephone (staff notes)		
Reference 2 followed up by telephone (staff notes)		
Answers to questions asked on child protection awareness		
Explanation of gaps in employment provided		
Proof of identity checked (identity document)		
Interview notes from safer recruitment trained staff		
Additional interview notes		
Academic qualifications checked (documents)		
Medical clearance obtained		
DBS certificate received and cleared		
Non-UK police check(s) received and cleared; or		
Risk analysis completed and cleared		

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Prohibition Order checks		
EEA check		
Section 128 checks for people in management positions		
Induction/safeguarding & child protection training completed		

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