

Safer Recruitment and Vetting

Procedures

Aim and Introduction

1. Chapelton Academy (henceforth, the Academy) is committed to providing an environment which recognises that the delivery and management of effective safeguarding of children and young people requires sound procedures, good inter-agency co-operation and highly competent and managed staff.
2. This policy document provides the policy and procedures which govern recruitment and vetting practices for staff and others who may come into contact with students at the Academy in the context of the Academy's operations.
3. To ensure a secure environment is maintained, the policy covers visiting, agency, contracted and casual staff, who are not directly employed by the Academy.
4. The policy should be read in conjunction with the following Academy policies and procedures:
 - a. Recruitment of Ex-Offenders statement (Appendix 3 to this Policy)
 - b. Equal Opportunities (Staff) Policy
 - c. Safeguarding and Child Protection Policy
 - d. Off-site and Residential Policy
 - e. Health and Safety Policy
 - f. Recruitment Policy

Objectives

5. The Academy's Governing Body will ensure that:
 - a. Senior staff and Governors undertake safer recruitment training;
 - b. Safe recruitment strategies are implemented on each occasion new staff are sought;
 - c. Appropriate steps are undertaken to ensure that adults working in the school are thoroughly vetted by undertaking the necessary criminal records, 'Barred List' and disqualification/prohibition/restriction from teaching checks, as well as checking references and relevant professional qualifications (as required, and as discussed below);
 - d. Staff are made aware of their responsibilities to ensure personal details are up to date on the Single Central Record;

- e. Unsuitable people are prevented from working at the Academy;
- f. It deals swiftly with any issues which arise from information provided through the checking procedure;
- g. Systems and processes are maintained that ensure students are kept safe, and that poor and unsafe practices are challenged;
- h. It identifies instances in which there are grounds for concern about a student's welfare, and takes appropriate action to keep all students safe;
- i. It reports unsafe practices to the responsible statutory authorities.

Legislation and Guidance

- 6. This policy provides a framework which refers to relevant legislation and incorporates the advised nationally recommended safeguarding practices, thereby ensuring that the Academy has in place a robust and rigorous recruitment and selection procedure which precludes unsuitable applicants from gaining a position with the Academy.
- 7. The policy has been developed in accordance with the Department for Education guidance contained in 'Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges' (2014). It also takes account of guidance provided by Ofsted on their web-site.¹
- 8. The Academy recognises its explicit duty under Section 175 of the Education Act 2002 and the Children Act 2004 to provide an environment which safeguards and promotes the welfare of children and young people.
- 9. The policy refers to the provisions of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and defines the activities and work considered to be a 'regulated activity' (work that a barred person must not do.)
- 10. The Secretary of State has the power to bar anyone from employment as a teacher and from work involving regular contact with children or young people in schools, colleges and academies. Chapelton Academy is under a statutory duty not to employ anyone who has been disqualified/prohibited/restricted by the

¹ See the 'Safeguarding Children' section of the Ofsted web-site
[<http://www.ofsted.gov.uk/schools/forschools/safeguarding-children>], accessed 20.06.14.

Secretary of State² or whose name appears on the 'Barred List'³. The Academy is required to apply for enhanced DBS checks when appropriate for its employees and others who may come into contact with Academy students as part of the Academy's operations.

11. Since the introduction of the new 'regulated activity' on 10 September 2012 there are now three types of criminal record check that are available through the DBS:
 - a. **Standard DBS check** – this checks only the information held on the Police National Computer
 - b. **Enhanced DBS with barred list information** (for those individuals who fall under the new definition of regulated activity)
 - c. **Enhanced DBS without barring information** (for those previously falling within regulated activity but not meeting the terms required under the new definition)

12. The new definition of 'regulated activity' in relation to children and young people now comprises:
 - a. Unsupervised activities – namely to teach, train, instruct children or young people, care for or supervise children or young people, or provide advice/guidance on well-being, and drive a vehicle only for children or young people. Supervision means day to day supervision as is reasonable in all circumstances for the protection of the children or young people concerned.
 - b. Work undertaken by individuals in the Academy (a 'specified place' as defined by the Safeguarding Vulnerable Groups Act 2006) with the opportunity for contact. Work carried out by volunteers supervised to a reasonable level, in accordance with the statutory guidance on supervision within the Academy is not a regulated activity. However, a supervised paid Academy employee does come under regulated employee status because of the definition applied under the Safeguarding Vulnerable Groups Act 2006 as working in a 'specified place.'
 - c. Work under *a* or *b* is a 'regulated activity' only if it is done regularly. Regularly means carried out by the same person either:
 - i. Once a week or more often or,
 - ii. 4 or more days in a 30 day period or,

² The list of prohibited/disqualified/restricted teachers is maintained by the 'National College of Teaching and Leadership', and can be checked via the 'Employer Access Online' section of the DfE's 'teacher services portal'.

³ The DBS service maintains the two 'barred lists' – the 'children's barred list' and the 'adults' barred list'. A check of these can be requested when commissioning an enhanced DBS check.

iii. Overnight between 2.00 a.m. and 6.00 a.m.

13. For the purposes of this policy, a 'child' is defined as an individual under the age of 18.

Implementation and responsibility

14. **Reviewing vacancies:** whenever a post is advertised, the Head Teacher and the FBM must determine whether or not it requires an enhanced DBS disclosure;
15. **Planning recruitment:** it is the responsibility of the Head Teacher and the FBM to ensure that staff recruitment happens in such a way that sufficient time is allocated for any pre-employment checks to take place;
16. **Job description and person specification:** it is the responsibility of the Head Teacher and the FBM to ensure that, when relevant, these should make clear that the post is such that regular, unsupervised contact with young people will be required and that therefore the applicant must be prepared to undergo appropriate DBS checks;
17. It is the responsibility of the FBM to ensure that advertisements for any vacancies must be placed on appropriate recruitment websites and, where relevant, must include the following text: 'The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment. An enhanced DBS check is required for all successful applicants.'
18. It is the responsibility of the FBM to ensure that the application process will make it clear in an information pack sent to all applicants that they are required to supply information relating to previous employment and education and that they will be asked to undergo an enhanced DBS check.
19. Although the Head Teacher is ultimately responsible for safeguarding, the FBM will be responsible for undertaking the necessary vetting checks for all staff, agency staff, volunteers, Members, Directors, and ex-officio Governors.
20. The Academy will, as part of its safer recruitment and selection process, undertake the following checks on prospective staff:
- a. An enhanced DBS check
 - b. An identity check
 - c. A 'Barred List' check

- d. A prohibition/disqualification/restriction on teaching check (for teaching staff)
 - e. The sourcing of a minimum of two written and verified professional references (where appropriate one of the references should be from the most recent employer where the person worked with, or was in contact with children or young people) to confirm previous academic and employment gaps (checking the reasons provided for any identifiable gaps);
 - f. Evidence of relevant qualifications (including, where relevant, professional qualifications) and current memberships of professional bodies;
 - g. Right to Work within the United Kingdom (through checking the authenticity of original documentation)
 - h. A medical fitness check
21. All applicants will be advised that an offer of employment can only be made subject to a satisfactory DBS check, references, and checks on qualifications and employment history (as well as any gaps in that history).
22. **Checks for overseas persons:** All new staff, agency staff, volunteers, and Directors and Members of the Academy Trust who have lived outside the United Kingdom are subject to such additional checks as are deemed appropriate where the required enhanced DBS check is not considered sufficient to establish suitability to work with children and adults in a regulated activity.
23. Applicants who have resided outside the UK for a continuous period of six or more months in the past 5 years will need to provide Criminal Convictions Clearance from the country(ies) which they were residing in, because the DBS cannot generally trace individuals abroad. If the Academy recruits an individual from overseas, or an individual who has lived abroad in recent years prior to appointment, and needs to check their overseas criminal record, a DBS check may not provide a composite picture of the criminal record.
24. Applicants will be asked to contact the relevant Embassy or other official office to obtain a disclosure. The issue date of the disclosure should be within six months of the date of receipt by the Academy Trust. Upon receipt the disclosure should be sent to the FBM.
25. The Home Office provides useful guidance on seeking foreign nationality criminal information. Documents that are evidence of an individual's overseas identity will be retained securely by the FBM in accordance with the UK Border Agency

guidance for the duration of the individual's employment and for a further two years after the individual's employment with the Academy has ceased.

26. Where a member of staff changes role and the role is directly concerned with dealing with Academy students in the Safeguarding Children and Adult regulated categories, a further appropriate enhanced DBS check will be carried out to update their record.
27. There is no blanket requirement to re-commission enhanced DBS checks for staff on the Academy's *direct payroll* who have unbroken service (i.e. with no breaks of three months or more). Ofsted guidance describes such re-checking as 'excessive', and states that it 'may be considered to represent a poor use of resources'.⁴ However, if there is a break in service of 3 months or more for any such staff a new DBS check will be carried out.
28. Since June 2013, for an annual subscription of £13.00, applicants can join the Update Service and have their DBS Certificate kept up-to-date. They can take it with them from role to role, within the same workforce, where the same type and level of check is required. The service is free to volunteers. If an applicant has subscribed to the Update Service, with their permission, the employer can use their current DBS Certificate and carry out a free, instant online Status Check to see if any new information has come to light since its issue, should they have cause to do so. Responsibility: FBM.
29. **Visiting staff and supply staff:** Visiting staff who do not have regular and unsupervised access to children or young people will not receive a DBS check. The normal risk assessment that applies to all Academy visitors will be sufficient.
30. In the case of visiting staff who are provided by an external organisation, and who do have unsupervised regular access to children or young people (such as educational psychologists, sports coaches, and agency staff), their 'providing organisation' will request the check.
31. The FBM will, prior to an individual's commencement, seek written confirmation from the respective agencies, thereafter annually, that the appropriate checks have been carried out and by whom. The appropriate checks are as follows:

⁴ Guidance on the Ofsted web-site [<http://www.ofsted.gov.uk/schools/for-schools/safeguarding-children>], accessed 20.06.14.

- a. Enhanced DBS Disclosure. The agency will confirm in writing that they have obtained a fresh enhanced DBS check within the last 3 years, or within the last three months if the teacher has a break in service of three months or more, or if there are grounds for concern about the person's suitability to work with children.
 - b. Identity check.
 - c. Check of the 'Barred List'.
 - d. Check of the list of disqualified/prohibited/restricted teachers.
 - e. Qualifications (as required).
 - f. Additional overseas activity checks (as required).
 - g. Check of the individual's right to work in the United Kingdom.
32. The agency will be asked for the necessary enhanced DBS certificate reference number and issue date. The agency will confirm to the FBM in writing that the disclosure provides the full details, namely the Police have not, using their common law powers under the Protection of Freedom Act 2012, passed on such relevant information to the agency about the individual which they consider to be justified and proportionate. In cases where a disclosure has been made on the certificate, the Trust must see a copy of the original.
33. The Trust will ensure that any agency staff offered for supply by an employment business are suitable for the work required, before they commence work at the Academy.
34. When reporting to the Academy's premises for their first day of work, agency staff will provide valid government-issued identification, regardless of the written confirmation provided by the employment agency.
35. The Trust should include into its contractual arrangements with employment agencies an obligation for the latter to fulfil its responsibilities with regard to the above paragraphs, including a requirement to supply to the Trust a copy of any enhanced DBS certificate which contains disclosures.
36. Where visiting staff have regular access to children or young people and those staff are not provided by external organisations, the Academy will ensure that the necessary DBS checks and other checks (as detailed above) take place.
37. Whenever any type of building work is undertaken of any duration, the Academy will at the planning stage determine with the contractors and agree the

safeguarding measures in relation to the works starting on site. The safeguarding measures will then be detailed in the building contract. Thereafter, Academy staff affected will be briefed on the supervision required and the access arrangements with the contractor. Responsibility: FBM

38. Visitors to the Academy, in whatever capacity, must be signed in and out at reception and provided with a visitor's badge. The visitors' book will be lodged at reception and will identify the member of staff receiving a visitor. This member of staff should meet the visitor in reception and should be fully aware of their movements and whereabouts at all times whilst at the Academy. Responsibility: FBM
39. **Members and Governors:** The following checks will be undertaken for all Academy Members and Governors, including ex-officio Governors (Responsibility: Head Teacher, Governors, FBM. Accountability: Chair of the Academy Trust):
- a. Enhanced DBS check (for the Chair of the Trust, the application form must be counter-signed by the Secretary of State)
 - b. Check of the list of disqualified/prohibited/restricted teachers (as required, in cases where the relevant person is due to carry out such work).
 - c. Additional overseas activity checks (as required).
 - d. Check of the individual's right to work in the United Kingdom.
 - e. Identity check
40. A 'Barred List' check is not usually required for Members and Governors, unless they are engaging in regulated activity.
41. **Volunteers:** An enhanced DBS check (with a 'Barred List' check) should be commissioned for volunteers in regulated activity who will look after or teach children on an unsupervised basis, or provide personal care on a one-off basis.
42. For volunteers not in regulated activity, an enhanced DBS check without a 'Barred List' check should be commissioned. The Trust is not legally allowed to request a 'Barred List' check on a volunteer who, because they are supervised, is not in regulated activity.
43. Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

44. The Trust should use its discretion when considering whether to commission an enhanced DBS check for a volunteer who is not engaging in regulated activity, on the basis of a risk assessment.
45. For more information on the vetting of volunteers, the Trust should consult the DfE's guidance, 'Keeping children safe in education: Statutory guidance for schools and colleges' (2014).

The Single Central Record

46. The Academy's Single Central Record (SCR) is maintained by the FBM (although the Head Teacher retains ultimate accountability for its integrity and completeness).
47. The SCR will cover the following persons:
 - a. All staff (including supply staff) who work at the Academy
 - b. All others who work in regular contact with students in the Academy (including volunteers)
 - c. All Members and Directors of the Academy Trust
48. In respect of these individuals (except those employed through an agency), the Academy's SCR will record whether or not the following checks have been carried out (including the person who undertook the check and the date this was done):
 - a. An identity check
 - b. Further checks on people living or working outside the United Kingdom, as required, and with regard to the guidance issued by the Secretary of State
 - c. Confirmation of the person's 'right to work' in the United Kingdom (Nb: this check does not apply in the case of volunteers)
 - d. A check of relevant professional qualifications (for staff and supply staff, where required)
 - e. An enhanced DBS check (in this case the SCR should also record the enhanced DBS certificate number and date of issue)
 - f. A 'Barred List' check (in all cases except for (a) Members and Governors, unless they are in a regulated activity, and (b) volunteers, unless they are in a regulated activity. Please see the sections on 'Members and Governors' and 'Volunteers' above for further information.)
 - g. A check of any prohibition/disqualification/restriction from teaching (for all teachers and supply teachers. This also applies to Members and Directors of the Academy Trust, but *only* if they intend to carry out such work as a prohibition order would or could concern).

49. In respect of individuals employed through an agency, the SCR will record the following:
- That the Agency has provided written confirmation to the Trust that the above checks have been carried out (the SCR will record who at the Trust the written confirmation was addressed to, and the date it was received).
 - The enhanced DBS certificate reference number, date of issue, and notification of whether any disclosures were reported (as provided by the agency in writing).
 - [In cases where the agency confirmed that a disclosure was reported] That the agency has provided the Trust with a copy of the original enhanced DBS certificate (the SCR will record who saw the copy and when).
 - That the person's identity was checked upon their arrival onto the Academy's premises (the SCR will record who checked the identity documents, and when).

Training

50. All staff and governors will receive induction training in relation to safeguarding at the earliest possible opportunity and in any case within the first two weeks of their employment. In addition, all staff and governors will undertake regular renewal training in respect of safeguarding. This will occur at least annually as well as whenever there are changes in legislation or DfE guidelines. Please see the Academy's 'Safeguarding and Child Protection Policy' for further details.
51. The FBM will be responsible for ensuring all staff involved in the Academy's recruitment, selection and vetting process undertake appropriate training.

The secure handling and use of disclosures and disclosure information

52. The Academy will continue to use the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust. It will also continue to comply fully with the respective Code of Practice regarding the correct handling and use of Disclosures and disclosure information.
53. The Academy will also comply fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling and use of disclosure information and has a written policy on these matters its "Data

Protection” policy. Disclosure information will never be kept on an applicant’s personal file and will be limited to those who are entitled to see it as part of their duties. In accordance with section 124 of the Police Act 1997, disclosure information will only be passed to those who are authorised to receive it in the course of their duties. The Academy maintains a record of all those to whom disclosures or disclosure information has been revealed and recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it. Disclosure information will only be used for the specific purpose for which it was requested and for which the applicant’s full consent has been given.

54. The Academy will keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, and the unique Certificate number.
55. Where issues arise in vetting and safeguarding checks on existing staff, or otherwise in relation to safeguarding, it will be the responsibility of the Head Teacher and FBM to make decisions where an employee needs to be removed immediately from an area/activity where it is felt a student may be put at risk.
56. The Personnel Sub-Committee must be informed immediately of any such decision. It is the Head Teacher’s and FBM’s responsibility to ensure that the Disciplinary Procedure is, where appropriate, invoked within *10 days of an incident occurring and the member of staff must be removed from site during this time.*
57. The employee will have the right to be accompanied during this process by a nominated work colleague, Trade Union or staff representative whilst an investigation is carried out. Responsibilities: Head Teacher and FBM

Appointment Prior to Check

58. Where there is a need for staff to be appointed into post prior to the DBS check being received by the Academy, this may be considered in exceptional circumstances, and when the individual concerned is being appointed to undertake non-student facing activities (eg: to attend induction training, or to undertake other duties which would not include them in engaging in any form of regulated activity).
59. In this case, the Head Teacher and FBM must complete the Safer Recruitment and Vetting Risk Assessment Form (Appendix 1) and report on this to the Personnel Sub-Committee of the Governing Body. This must be accompanied by

the Prospective Employee Statement of No Convictions (Appendix 2).
Responsibility: Head Teacher and FBM. Accountability: Head Teacher

60. Any person refusing to be checked by the Academy will be unable to be employed, as this is a prerequisite to offering or continuing in any contract of employment. The Academy, at its own discretion, will cover all fees paid to the DBS.

Responsibilities for implementation of the policy

61. In addition to the responsibilities attached to individual points above:
- a. The Academy's Governing Body, together with the Head Teacher and FBM, will be responsible for ensuring that an annual review of the effectiveness of this policy and the associated procedures takes place annually or in accordance with statutory change.
 - b. The Governing Body will be provided annually with statistical data by the FBM which demonstrates the effectiveness or otherwise of the process and which will be used to inform subsequent recommendations in development and guidance to support the implementation of the policy and procedures.
 - c. The Head Teacher, Deputy Head Teacher and FBM will ensure that all aspects of the policy are adhered to in order to ensure that there is no discrimination against any employee.
 - d. It will be the Head Teacher's and FBM's responsibility to ensure that risk assessments are carried out in accordance with this policy and procedure (as required, and particularly in the instances discussed above).

Where there is joint responsibility for any of the matters in the paragraph immediately above, accountability will rest with the Head Teacher.

Review and monitoring

62. The policy and procedure will be reviewed at least on an annual basis as well as in accordance with any legislative change or change in DfE guidance. The initial review will take place (at most) one year after the policy and procedure comes into effect.

Signed by *R Maxted & AWright*

Agreed by TGB - **March 2014**

Reviewed by	Temporary Governing Body
Last Reviewed	February 2016
Adopted by GB	May 2016
Next Review	Academic year 2018/2019

Appendix 1 – Safer Recruitment Vetting and Barring Checks – Risk Assessment

Appendix 2 – The Prospective Employee’s statement of no convictions

Appendix 3 – Recruitment of Ex-Offenders Statement

APPENDIX 1

RISK ASSESSMENT: SUPERVISION PENDING DBS DISCLOSURE

It is a legal requirement that all new staff appointed to Chapelton Academy who are providing education and regularly caring for, teaching, training, instructing, supervising or being solely in charge of children and young people and who will engage in **‘regulated activities’** MUST have the appropriate type of **Enhanced DBS Disclosure**. The Members and Directors of the Academy Trust and other volunteers are also subject to checks. All contractors (working in the Academy for a period of time) must provide written confirmation that their staff have been checked as this forms part of any contract with the Academy.

In circumstances where a DBS Disclosure is pending, the Head Teacher and FBM have the discretion to allow an individual within a *non-student facing role* to commence work, **PROVIDED** that the following Risk Assessment form is completed and the name of the supervisor/s is provided. This permission will only be given once all other Vetting and Barring checks have been carried out and these prove satisfactory (with the exception of the ‘Barred List’ check, which will, if requested, accompany the DBS check). **Completion of this Risk Assessment form is compulsory and can only be done by the Head Teacher / FBM. The form, when completed, should be forwarded to whichever (of the Head Teacher /FBM) did not complete the form, for approval and countersigning.**

Name of new member of staff

Department.....

Proposed start date

Brief Description of their Job Role

What is their previous experience and do they currently hold a DBS?

If they hold a current DBS what is the Disclosure Reference Number?

Who will their supervisor/s be (contact name)?

Briefly describe the supervisory arrangements and restrictions to their role that are proposed (these might typically include wearing a visitors badge at all times, regular rotation of duties, restriction of movement to social areas of the Academy, being accompanied and supervised at all times):

Briefly describe the business reasons why the new starter needs to join the Academy urgently:

Have all the reference checks been completed (e.g most recent employer)? Yes/No Are these satisfactory? Yes/No

Any other relevant information:

I understand that this person will not have access to any student or any staff data while employed under this arrangement

Signed (Head Teacher or FBM)

Date forwarded to Head Teacher / FBM for counter-signature

This risk assessment is valid until --/--/---- only.

This form should be destroyed upon receipt of a clear enhanced DBS clearance certificate
APPENDIX 2

The Prospective Employee's statement of no convictions

The area you are to work in wishes to ensure they have cover for the safety of all students and you are therefore asked to sign the following statement and return this immediately to the FBM, with the completed DBS application form and identification documents.

I understand that the Academy will carry out a Vetting and Barring list check and I declare that I do not have a record of being barred from working with young people and vulnerable adults.

If the Vetting and Barring check shows this statement to be untrue I acknowledge that the Academy will inform the relevant authorities.

I hereby declare that I have had no convictions or cautions.

I understand that I must be supervised at all times whilst I am working for the Academy during the period.

Declaration

I confirm that the information I have provided is complete and true and understand that knowingly to make a false statement is a criminal offence.

Signature Date

APPENDIX 3

Policy Statement on the Recruitment of Ex-offenders

It is a requirement of the DBS's Code of Practice that all Registered Bodies must treat DBS applicants who have a criminal record fairly and do not discriminate because of a conviction or other information revealed. It also obliges Registered Bodies to have a written policy on the recruitment of ex-offenders; a copy of which can be given to DBS applicants at the outset of the recruitment process.

Statement

As an organisation using the Disclosure and Barring Service (DBS) to assess applicants' suitability for positions of trust, Chapelton Academy complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other information revealed.

The Academy is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, marital status, age, disability or offending background.

The Academy has a written policy on the recruitment of ex-offenders (i.e. this policy), which is made available to all DBS applicants at the outset of the recruitment process. The Academy actively promotes equality of opportunity for all with the right level of talent, skills and potential and welcomes applications from a wide range of candidates. Having a criminal record will not necessarily be a bar from working at the Academy. It will depend on the nature of the position and the circumstances and background of the offence.

The Academy selects all candidates for interview based on their skills, qualifications and experience. A DBS check is only requested after a thorough risk assessment has indicated that one is proportionate and relevant to the position concerned. For those positions where a DBS check is required, all job adverts and job descriptions will contain a statement that a DBS check will be requested in the event of the individual being offered the position. Where a DBS check is to form part of the recruitment process, the Academy will encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. The Academy will request that this information is passed under separate, confidential cover, to the FBM. The Academy guarantees that this information will only be seen by those who need to see it as part of the recruitment process.

The Academy will ensure that all those involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. The Academy will also ensure that all recruiting staff have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974. On the subject of any offences or other matter that might be relevant to the position the Academy will ensure that an open and measured discussion takes place as defined in the Rehabilitation of Offenders Act 1974. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer. The Academy will make every individual who is the subject of a DBS check aware of the existence of the DBS Code of Practice and will make a copy available upon request. The Academy will undertake to discuss any matter revealed in a DBS check with the individual seeking the position before withdrawing a conditional offer of employment.